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**MISSOURI PUBLIC SERVICE COMMISSION**

**CASE NO. ER-2019-0335**

**REBUTTAL TESTIMONY**

**OF**

**JOHN J. REED**

**ON**

**BEHALF OF**

**UNION ELECTRIC COMPANY**

**d/b/a Ameren Missouri**

**St. Louis, Missouri  
January 2020**

Ameren Exhibit No. 15  
Date 3/11/20 Reporter JWB  
File No. ER-2019-0335

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**REBUTTAL TESTIMONY**

**OF**

**JOHN J. REED**

**FILE NO. ER-2019-0335**

**I. INTRODUCTION**

1

2 **Q. Please state your name and business address.**

3 A. My name is John J. Reed, and my business address is Concentric Energy  
4 Advisors, 293 Boston Post Rd. West, Suite 500, Marlborough, MA 01754.

5 **Q. Did you previously submit Direct Testimony in this case?**

6 A. Yes, I did, on July 3, 2019.

7 **Q. On whose behalf are you submitting this Rebuttal Testimony?**

8 A. I am submitting this Rebuttal Testimony on behalf of Union Electric  
9 Company d/b/a Ameren Missouri (sometimes referred to herein as the "Company").

10

**II. OVERVIEW OF TESTIMONY**

11 **Q. What is the purpose of your Rebuttal Testimony?**

12 A. I am responding to the Direct Testimony of Mr. Robert Schallenberg, filed on  
13 behalf of the Office of Public Counsel ("OPC"), regarding the ratemaking treatment of Ameren  
14 Missouri's affiliate transaction costs and what he has alleged are violations of the Missouri  
15 Affiliate Transaction Rule (20 CSR 4240-20.015) ("Rule") applicable to electric utilities.

16 **Q. Please summarize your Rebuttal Testimony.**

17 A. Mr. Schallenberg has criticized Ameren Missouri's conduct in several areas  
18 relating to affiliate transaction costs, and has recommended that the Commission exclude  
19 virtually all of Ameren Missouri's Administrative and General costs ("A&G," and also referred

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1 to herein as corporate support service costs) from the rates to be established in this case.  
2 Disallowing this amount, \$218.2 million, effectively presumes that under the “lower of cost or  
3 market” standard for affiliate transaction pricing that the market value of all of Ameren  
4 Missouri’s corporate support services is zero. This would be, if adopted, a completely  
5 unsupportable and entirely unreasonable result of the ratemaking process. Mr. Schallenberg has  
6 not provided a justification for disallowing a single dollar of these costs.

7 **Q. How is the balance of your Rebuttal Testimony organized?**

8 A. I have organized my testimony to follow the sequence of Mr. Schallenberg’s  
9 testimony on affiliate transaction costs. First, I address the use of Ameren Services  
10 Company (“AMS”) as a corporate support service provider for all of Ameren Missouri’s  
11 affiliates, and the consequences that this structure has for reflecting affiliate transaction  
12 costs for needed corporate support services in the revenue requirement used to set rates.  
13 Next, I address the positions of Mr. Schallenberg on the pricing of affiliate transactions,  
14 and the standards established by law and regulatory precedent for these transactions.  
15 Following that, I address Mr. Schallenberg’s criticisms of the Company’s purchasing  
16 practices, followed by my response to his criticism that the Company has not met its  
17 obligation to establish and maintain separate books and records for Ameren Missouri.  
18 Finally, I address Mr. Schallenberg’s proposed disallowance in this case, and explain why  
19 that result would be completely inappropriate under any conventional ratemaking standard  
20 for cost recovery. I also conclude that his allegations, and his proposed “remedy,” are  
21 completely disconnected and ignore the purposes of the affiliate transaction rule and the  
22 rate setting process.

1       **III.    ROLE OF AMS IN PROVIDING CORPORATE SUPPORT SERVICES**

2           **Q.    What did Mr. Schallenberg state in his Direct Testimony regarding the**  
3 **role of AMS in providing corporate support services to Ameren Missouri?**

4           A.    Mr. Schallenberg correctly noted that AMS is a “sister company” providing  
5 goods and services to both Ameren Missouri and Ameren Illinois, along with all other  
6 Ameren entities.

7           **Q.    Did Mr. Schallenberg make any other observations regarding the role**  
8 **of AMS, or the implications of this service company structure for Ameren Missouri’s**  
9 **recovery of its costs from affiliate transactions?**

10          A.    No, he did not challenge the appropriateness of this structure or the business  
11 relationships that exist between AMS and its affiliated companies.

12          **Q.    Are there other facts that you believe Mr. Schallenberg should have**  
13 **noted with regard to this structure, and its consequences for Ameren Missouri’s cost**  
14 **recovery?**

15          A.    Yes, there are several additional facts relating to the role of AMS that are  
16 important to recognize in evaluating the Company’s affiliate transactions. These facts  
17 include:

18           1. AMS has been Ameren Missouri’s corporate support services provider for more  
19 than 22 years; the services provided to Ameren Missouri, and the pricing of these services,  
20 has remained largely the same for many years;

21           2. The Commission approved the holding company structure, including the  
22 utilization of AMS as the group’s corporate support services provider;

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1           3. AMS provides its services to all of its affiliates at cost, with no margin or profit  
2 included in the price of these services;

3           4. As discussed in the Rebuttal Testimony of Mr. Tom Byrne in this case, and in  
4 my Direct Testimony in MPSC File No. EO-2017-0176, at page 9 (which is attached hereto  
5 as Schedule JJR-R1), at the time of the creation of the holding company, federal regulations  
6 required that service companies be used to provide corporate support services in holding  
7 company structures; these service companies were required to provide these services at  
8 cost;

9           5. Also as discussed in Schedule JJR-R1, at page 9, although the requirement for  
10 the use of a service company has been repealed, if a service company is used, it must  
11 continue to use cost-based pricing; AMS operates in conformance with these requirements;  
12 and

13           6. The use of service companies for public utility holding companies remains  
14 common, and hundreds of companies receive services from these service companies; this  
15 structure is highly effective in delivering synergies for public utility corporate support  
16 services.

17           All of these facts provide an important foundation for evaluating the reasonableness  
18 of the affiliate transaction costs that Ameren Missouri has included in its cost of service in  
19 this rate application, and for evaluating how these costs and Ameren Missouri's actions fit  
20 within the Commission's requirements for affiliate transactions. Mr. Schallenberg's  
21 analysis and criticisms of Ameren Missouri's conduct is incomplete and misdirected as a  
22 consequence of his failure to note or consider these important facts.

1                                   **IV.     PRICING OF AFFILIATE TRANSACTIONS**

2           **Q.     What has Mr. Schallenberg stated with regard to the pricing of**  
3 **corporate support services that are at issue in this proceeding?**

4           A.     He acknowledged at page 1, lines 10-13, that the issue before the  
5 Commission is “to identify impacts of the Company’s affiliate transactions practices on the  
6 determination of Ameren Missouri’s costs to be used to establish whether the existing  
7 customer rates are or are not just and reasonable.” In simpler terms, the issue before the  
8 Commission is setting Ameren Missouri’s rates, based on a reasonable level of expenses,  
9 including the expenses for corporate support services provided by AMS. Notably, this is  
10 not a complaint proceeding regarding past Company practices, nor a rulemaking regarding  
11 the development or reformation of Commission rules and regulations.<sup>1</sup> He has correctly  
12 noted that the Commission’s concerns with affiliate transaction pricing stem from a  
13 utility’s “incentive to shift their non-regulated costs to their regulated operations,” the  
14 effect that such a shift would have in terms of “unnecessarily increasing the rates charged  
15 to utility customers,” and the use of asymmetrical pricing standards to “prohibit utilities  
16 from providing an advantage to their affiliates to the detriment of rate-paying customers.”<sup>2</sup>  
17 I agree with this basis for the Commission’s past concerns with affiliate transactions, and  
18 this view is consistent with the express language of the Commission’s rules which state that  
19 “regulated utility shall not provide a financial advantage to an affiliated entity.”<sup>3</sup> This rule  
20 requires the use of asymmetric pricing for the provision of, and receipt of, corporate  
21 support services provided by an affiliate. Unfortunately, while Mr. Schallenberg notes this

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<sup>1</sup> Such a rulemaking workshop is currently underway in File No. AW-2018-0394.

<sup>2</sup> Schallenberg Direct, p. 4, l. 19 to p. 5, l. 7.

<sup>3</sup> 20 CSR 4240-20.015(2).

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1 context for the Commission's concerns about affiliate transactions, he fails to note that this  
2 context is no longer applicable for Ameren Missouri.

3 Finally, Mr. Schallenberg offers a sweeping generalization that seems to color his  
4 entire testimony on this issue: "Affiliate transactions are commonly done on terms that are  
5 not in the best interest of all the persons or entities entering into the agreement."<sup>4</sup> He offers  
6 no support at all for this statement, and it is completely contrary to my 43 years of  
7 experience in utility management and ratemaking. In my experience, as discussed in my  
8 Direct Testimony in this case, the provision of corporate support services through an  
9 affiliate is at the heart of the type of A&G cost synergies that utilities have attempted to  
10 capture in many recent mergers and has been encouraged by regulators.

11 **Q. What is Mr. Schallenberg's conclusion with regard to Ameren**  
12 **Missouri's compliance with the Commission's affiliate transaction rules?**

13 A. He concludes that "There is no documentation that Ameren Missouri has  
14 ever been in compliance with the Commission's affiliate transaction rules..."<sup>5</sup>

15 **Q. Is there such "documentation" in this proceeding?**

16 A. Yes, and in MPSC File No. EO-2017-0176. My Direct Testimony and  
17 exhibits in these two dockets total 202 pages. Mr. Byrne's testimony and exhibits in these  
18 two cases total more than 275 pages. These documents, and many more that have been  
19 produced in these filings and in discovery, provide exactly the documentation that Mr.  
20 Schallenberg claims does not exist. Notably, he makes no mention whatsoever in his Direct  
21 Testimony in this case of any of this material, even though it was provided many months  
22 before his testimony here was filed.

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<sup>4</sup> Schallenberg Direct, p. 3, l. 14.

<sup>5</sup> Schallenberg Direct, p. 5, l. 11-12.



1           **Q.     Please summarize your prior testimony on the issue of Ameren**  
2 **Missouri’s compliance with the Commission’s asymmetric pricing rule.**

3           A.     I have noted that:

4           1. Ameren Missouri no longer has any competitive affiliates that are significant;  
5 therefore, the entire basis for the Commission’s past concerns with cross-subsidization and  
6 advantages provided to competitive affiliates are no longer present for Ameren Missouri;

7           2. The Commission’s concerns for the pricing of affiliate transactions expressly  
8 treat the provision of corporate support services as an exception to the circumstances giving  
9 rise to these concerns;<sup>6</sup>

10          3. The Commission has made clear in past waivers of the affiliate transaction rule  
11 that “the purpose of the Commission’s Affiliate Transaction Rule is to prevent cross-  
12 subsidization of regulated utility’s non-regulated operations, not to prevent transactions at  
13 cost between two regulated affiliates”;<sup>7</sup>

14          4. I have also explained how, for Ameren Missouri’s transactions with AMS, the  
15 cost of services and the market value for services conflate to a single value; therefore, the  
16 use of AMS’s fully distributed cost complies with the Commission’s pricing rule, and also  
17 complies with the Federal Energy Regulatory Commission’s (“FERC”) requirement that  
18 AMS provide its services to its utility affiliates at cost.

19          **Q.     Please expand on your statement that the cost and market value of**  
20 **AMS’s services provided to Ameren Missouri conflate to a single value.**

21          A.     As I have previously testified, AMS rigorously applies market-based  
22 standards to the prices it pays for labor and for other goods and services. Most of AMS’s

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<sup>6</sup> Commission Rule Section (2)(B).

<sup>7</sup> Report and Order, File No. EM-2007-0374, July 1, 2008, p. 264.

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1 costs are labor costs. AMS's goal is to provide a total compensation package for its  
2 employees that represents the median of the market. To help achieve and monitor this,  
3 AMS routinely benchmarks its labor costs against local, regional, and national companies.  
4 AMS applies these same market-based standards to other procurements. AMS and Ameren  
5 Missouri also benchmark total costs, and the specific costs of functional areas, against  
6 different peer groups on a periodic basis, which helps to ensure that Ameren Missouri's  
7 customers are not being asked to pay costs that are above market. After securing all of the  
8 necessary inputs for corporate support services at market-based cost levels, AMS then  
9 charges Ameren Missouri these costs, on a fully distributed cost basis, and only these costs,  
10 for the corporate support services that are selected by Ameren Missouri. Therefore, the  
11 cost charged by AMS reflects the market value of these services, while still representing  
12 cost-based pricing as required by FERC.

13 **Q. Does Mr. Schallenberg provide any specific examples of Ameren**  
14 **Missouri's transactions with affiliates that he believes are incorrectly priced, or that**  
15 **result in unreasonable expense levels for Ameren Missouri?**

16 **A.** He does not. Instead, he cites general categories of what he considers to be  
17 non-compliant with the Commission's pricing rule. These categories are "purchasing  
18 goods and services outside the requirement of the Company's normal procurement policies,  
19 procedures, and practices," "paying AMS more for goods and services than it would cost  
20 for Ameren Missouri to produce the goods and services itself," and "paying AMS more  
21 than Ameren Missouri would pay to a non-affiliate for a product."<sup>8</sup> Mr. Schallenberg does

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<sup>8</sup> Schallenberg Direct, p.5, l. 21 to p. 6, l. 3.

1 not get any more specific than that, and does not offer any view as to what a reasonable or  
2 compliant price would have been for any transaction or group of transactions.

3 **Q. Is it likely that Ameren Missouri could have secured these services at a**  
4 **lower cost by providing the services itself, or purchasing the services from a third**  
5 **party?**

6 A. No, that is almost certainly not the case. As discussed in my prior  
7 testimony, AMS's use of cost-based pricing, reflecting market-based procurement of all  
8 inputs and no profit margin, results in costs for AMS that are almost certainly lower than  
9 any third party could offer on a sustainable basis. In addition, since AMS's costs reflect  
10 the synergies achievable through the provision of corporate support services for a group of  
11 regulated utilities under Illinois, FERC, and Missouri jurisdiction, the stand-alone costs  
12 that Ameren Missouri could achieve are almost certainly higher than AMS's costs. This is  
13 corroborated by the analysis I presented in my Direct Testimony in this case in Schedule  
14 JJR-D4, which shows that the A&G cost levels for the individual utilities would have been  
15 materially higher on a stand-alone basis than have been achieved through the use of AMS  
16 as a service company. Mr. Schallenberg makes no mention of this analysis. It is also  
17 notable that the Illinois Commerce Commission, FERC, and the Commission all review  
18 the costs charged by AMS to its affiliated utilities, and, at least as far as I am aware, none  
19 of them have ever concluded over the 22-year history of AMS that any of these costs are  
20 unreasonable or above market, and none of them have been disallowed on the grounds that  
21 they are the product of an inappropriate affiliate transaction.

22

1           **V. PURCHASING PRACTICES OF AMEREN MISSOURI**

2           **Q. OPC witness Schallenberg suggests that “Ameren Missouri has no**  
3 **ability to competitively bid the services it receives.”<sup>9</sup> Do you agree?**

4           A. I do not. Ameren Missouri will seek competitive bids for services when it  
5 is concluded that neither the Company nor AMS can provide a required service. Ameren  
6 Missouri is not staffed to self-provide all of the services it requires. The employees of  
7 Ameren Missouri are primarily responsible for the provisioning of service to its electric  
8 and gas customers. Where the Company cannot self-provide services, it relies upon either  
9 AMS or non-affiliated companies to provide the required services. Given that the wages  
10 paid to AMS and Ameren Missouri employees are the same for similar positions, and that  
11 AMS is a not-for-profit service provider, AMS’s cost should be equal to or below that of  
12 Ameren Missouri’s cost to provide the services. AMS’s cost would likely be lower because  
13 it provides similar services for each of its affiliated companies and can provide services  
14 more efficiently, and thus at a lower cost, than employees of a single utility, in this case  
15 Ameren Missouri.

16           AMS benchmarks its wages, salaries, and benefits to the market, therefore the  
17 wages paid to Ameren Missouri and AMS employees are known to be competitive with  
18 other market service providers. Further, Ameren Services provides its services to Ameren  
19 Missouri at cost, whereas a non-affiliated service provider would have a profit margin  
20 included in its costs. Soliciting competitive bids from parties is a costly exercise for both  
21 the Company and non-affiliated service providers. Having a service provider providing a  
22 service that pays a competitive wage, but has no profit margin, will always have a lower

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<sup>9</sup> Schallenberg Direct, p. 7, l. 9.

1 cost than a for-profit company that pays a competitive wage. Repetitively seeking bids  
2 where the non-affiliated service providers have consistently shown that they cannot  
3 compete with Ameren Services' cost of providing services is a waste of time and money  
4 for both the utility and the service providers and will produce no benefits for Ameren  
5 Missouri's customers.

6 **Q. OPC witness Schallenberg asserts that "the Company is unable to**  
7 **choose which goods or services it receives from AMS." Do you agree with the**  
8 **characterization?**

9 A. No. As discussed in my direct testimony as well as the direct testimony of  
10 Ameren Missouri witness Ben Hasse in File No. EO-2017-0176, Ameren Missouri and  
11 AMS, follow yearly, and on an ongoing basis, a Joint Planning and Procurement Policy  
12 which reflects a planning process for each budget cycle including reviews as each budget  
13 year progresses. The Policy was provided with my Direct Testimony as Schedule JJR-D2.  
14 It is during that process that Ameren Missouri determines its need for various services, the  
15 value of those services, and the level of the service it will receive from AMS. It is during  
16 this process that Ameren Missouri can discuss practical alternatives to receiving a good or  
17 service from AMS, including outsourcing the service.

18 **Q. In your opinion, has Ameren Missouri or its customers been harmed in**  
19 **any way by what Mr. Schallenberg alleges are violations of the affiliate transactions**  
20 **rule?**

21 A. No. As discussed above and in my Direct Testimony, a more thorough  
22 examination of Ameren Missouri's procurement of corporate support services shows that  
23 the Company has benefited from the synergies that AMS is able to take advantage of. Self-

1 provision of these services, as suggested by Mr. Schallenberg, would certainly be more  
2 expensive. It is not surprising that Ameren Missouri's costs from AMS have been shown  
3 to be reasonable because these costs reflect no profit or margin, which would not be  
4 achievable in procurement from third parties as Mr. Schallenberg alternatively suggests.

5 **VI. AMEREN MISSOURI'S RECORDKEEPING**

6 **Q. Mr. Schallenberg also asserts that Ameren Missouri does not maintain**  
7 **its own books and records. How do you respond?**

8 **A. Mr. Schallenberg's claim is without merit. While I would concur that**  
9 **Ameren Corporation and its affiliates appropriately utilize a single computerized financial**  
10 **reporting system, Ameren Missouri is able to, and as confirmed by Company witnesses**  
11 **Tom Byrne and Laura Moore, does maintain and have control of a separate set of financial**  
12 **books and records for Ameren Missouri. A single financial reporting system is essential**  
13 **to meet the requirements of the Sarbanes Oxley Act, which requires an effective and**  
14 **consistent set of financial controls. Nonetheless, Ameren Missouri's books and records**  
15 **are fully able to, and do, produce stand-alone financial statements for corporate**  
16 **governance, financial reporting, regulatory reporting, rate case preparation, local taxes, and**  
17 **all other purposes – there is no comingling of accounts or records with those of its affiliates,**  
18 **and there are no “gray areas” for which the delineation of assets, revenues, and expenses**  
19 **are unclear. If Ameren Missouri did not maintain and have control of its own books and**  
20 **records, the Company would not be able to produce the rate base and operating expenses**  
21 **required to establish rates in a rate proceeding. But, it does, and these functions are fully**  
22 **and reliably performed by Ameren Missouri. Therefore, Mr. Schallenberg's allegation that**

1 Ameren Missouri does not maintain and have control of its own books and records is  
2 incorrect.

3 **Q. In your experience, is utilization of a single financial reporting system**  
4 **in which each operating company's information can be fully segregated unique?**

5 A. No. The fact that Ameren Missouri allows its service provider – the service  
6 company – to make entries into the financial reporting system in its ledger, etc., which is  
7 the same for Ameren Corporation and all of its other subsidiaries, is no different than any  
8 other companies that use a service company structure. There is no basis for concerns, or  
9 for alleging a violation of Commission rules, based on this approach to service company  
10 accounting.

11 **Q. Does Mr. Schallenberg also claim that Ameren Missouri does not have**  
12 **separate administrative departments such as human resources or legal departments,**  
13 **and relies primarily on AMS for those functions?**

14 A. Yes, he does.

15 **Q. How do you respond?**

16 A. There is nothing to suggest that the approach that AMS uses is problematic  
17 or unusual. Mr. Schallenberg appears to desire an operating environment that has not  
18 existed in the energy business for over 20 years. With industry consolidation, companies  
19 have aggressively sought opportunities to reduce costs. Industry mergers have often  
20 resulted in the formation or expansion of service companies such as AMS. As I stated in  
21 my Direct Testimony, the Missouri Public Service Commission approved in 1997 the  
22 formation of AMS, a centralized service company that provides corporate support services  
23 to Ameren Corporation affiliates at cost. The adoption of a centralized service company

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1 approach is counterintuitive to requiring each operating company under common  
2 ownership have separate administrative departments. One of the principal benefits of  
3 consolidation continues to be realizing cost efficiencies, which are realized by identifying  
4 and eliminating duplicative functions.

5 **VII. RATEMAKING TREATMENT OF AFFILIATE**  
6 **TRANSACTION COSTS**

7 **Q. What is Mr. Schallenberg's recommended ratemaking treatment of**  
8 **Ameren Missouri's costs arising from affiliate transactions?**

9 A. He makes the extraordinary recommendation that all of these costs, i.e.,  
10 \$218.2 million for the test period, be excluded from Ameren Missouri's rates established  
11 in this case.

12 **Q. What is his basis for this recommendation?**

13 A. He reaches this recommendation based on his earlier conclusion that these  
14 costs are the product of transactions that do not comply with the Commission's rules for  
15 affiliate transactions.

16 **Q. You have explained in the preceding sections of this Rebuttal**  
17 **Testimony why you disagree with his conclusion regarding the alleged**  
18 **inappropriateness of Ameren Missouri's affiliate transaction costs. Putting those**  
19 **differences aside, if one were to accept Mr. Schallenberg's conclusion that the affiliate**  
20 **transactions at issue in this case did not fully comply with the Commission's**  
21 **regulations, would his recommended ratemaking treatment be appropriate?**

22 A. No, his proposed ratemaking treatment would certainly not be appropriate.  
23 It is my understanding that the purpose of this proceeding is not to judge Ameren  
24 Missouri's past practices, or to adjudicate a complaint regarding an alleged infraction of



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1 Commission rules. It is to set prospective just and reasonable rates for utility services  
2 provided by Ameren Missouri. Under traditional ratemaking conventions, these rates are  
3 to provide the utility with a reasonable opportunity to recover its reasonable costs,  
4 including a reasonable cost of capital (i.e., its allowed return). Even if one were to accept  
5 that some degree of past non-conformance with Commission regulations had occurred, the  
6 Commission would be left with the question of what level of prospective A&G costs should  
7 be reflected in the revenue requirement used to set Ameren Missouri's rates. This requires  
8 that the Commission evaluate what the appropriate level of expenses would be under an  
9 acceptable level of compliance with the "lower of cost or market" pricing rule. In this  
10 regard, the alleged non-compliance with the affiliate transaction standards can be compared  
11 to an allegation that a utility has not complied with the Commission's accounting rules,  
12 and has inappropriately expensed a cost rather than capitalizing it. Under those  
13 circumstances, if the allegation was shown to have merit, it would be reasonable for the  
14 Commission to remove the amount of the expense from the utility's test year expense level  
15 in its cost of service. However, this action would only be reasonable if the Commission  
16 also then included the same amount in the utility's capital-related accounts (i.e., rate base  
17 and depreciation) for the test year. Through these paired actions, the Commission would  
18 be able to correct for the infraction of its accounting rules and set rates that are just and  
19 reasonable. Making the elimination of the expense, without addressing the corresponding  
20 increase in capitalized cost that would have occurred under fully-compliant conduct, would  
21 not produce just and reasonable rates. The same logic applies to Mr. Schellenberg's  
22 accusations in this case, if they were found to have any merit. It would be inappropriate to

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1 remove the A&G costs that he alleges were improperly incurred without substituting the  
2 amount that “should” have been incurred.

3 **Q. Is there evidence in the record in this case as to what Ameren**  
4 **Missouri’s costs would have been under Mr. Schallenberg’s “but for” set of facts, i.e.,**  
5 **circumstances under which Ameren Missouri fully complied with what Mr.**  
6 **Schellenberg believes the regulations require?**

7 A. Yes, there is. Mr. Schallenberg singled out two accusations when he  
8 answered his own question regarding the specifics of what he believes was wrong with  
9 Ameren Missouri’s conduct with regard to affiliate pricing. Specifically, he claims that  
10 Ameren Missouri could have experienced lower costs if it either self-provided the services  
11 or procured these services from a third party (presumably at market prices). The analyses  
12 I presented in my Direct Testimony in this case addressed those two specific circumstances.  
13 In Schedule JJR-D4, I compared the stand-alone or self-performed cost level to the AMS  
14 cost level by inflation-adjusting the Ameren utilities’ pre-merger stand-alone A&G costs  
15 to their current allocated AMS costs. The current costs from the service company are  
16 materially lower than the inflation-adjusted self-performed cost levels. In Schedule  
17 JJR-D5, I compared Ameren Missouri’s non-fuel O&M and A&G cost levels to national  
18 averages for a utility peer group. Presumably, the average amount paid by others is  
19 equivalent to the “market” level of prices for these services. As shown in that analysis,  
20 Ameren Missouri’s A&G cost levels in 2018 were 18.5 percent below the national average.  
21 Therefore, one can reasonably and confidently conclude that if either of Mr. Schallenberg’s  
22 alternate approaches had been used, either self-performing or market-based procurement  
23 from third parties, the costs would have been higher for Ameren Missouri. This is not at

1 all surprising when one recognizes the economies of scale that AMS can achieve, and the  
2 fact that its services are provided on a zero-profit basis.

3 **Q. Does this mean that Ameren Missouri's costs from affiliate transactions**  
4 **should not be reviewed or analyzed by the Commission?**

5 A. No, the reasonableness of these costs continues to be an issue for the  
6 Commission to review. As Ameren Missouri has stated in its position in MPSC File No.  
7 EO-2017-0176, it understands that its expense levels are and will continue to be subject to  
8 challenge on the grounds of reasonableness or prudence in any rate proceeding.<sup>10</sup>

9 **Q. What do you believe is the appropriate rate treatment for Ameren**  
10 **Missouri's filed-for level of affiliate transaction costs?**

11 A. These costs should be granted full inclusion in Ameren Missouri's test year  
12 cost of service.

### VIII. CONCLUSIONS

14 **Q. What are your conclusions regarding the issues and recommendations**  
15 **that Mr. Schallenberg has made in his Direct Testimony regarding Ameren**  
16 **Missouri's affiliate transaction costs?**

17 A. Mr. Schallenberg has provided a number of broad generalizations about the  
18 costs of affiliate transactions in general and the costs of the transactions that Ameren  
19 Missouri has undertaken with its affiliated service company, AMS. Mr. Schallenberg  
20 apparently seeks to transform this rate proceeding into a sweeping investigation of Ameren  
21 Missouri's practices with regard to affiliate transactions over the past 20-plus years. In  
22 evaluating Ameren Missouri's compliance with the Commission's Affiliate Transaction

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<sup>10</sup> Byrne Direct, File No. EO-2017-0176, p. 5, l. 15 to p. 6, l. 2.

Rebuttal Testimony of  
John J. Reed

1 Rule, he seeks to apply an interpretation of that rule which ignores the purpose and premise  
2 of the rule, i.e., the prevention of cross-subsidies between a utility and its unregulated  
3 affiliates. Based on his interpretation, and his conclusion that the record in this case is  
4 insufficient to demonstrate past compliance with the rule, he recommends the disallowance  
5 of \$218.2 million of Ameren Missouri's test year A&G costs, which is the entirety of these  
6 costs. Mr. Schallenberg's conclusion is unfounded, and he has apparently arrived at that  
7 finding without any consideration of the Direct Evidence that the Company has filed in this  
8 proceeding. He has shown no awareness or consideration of the evidence that AMS's cost-  
9 based pricing also equates to market-based pricing, or the evidence that AMS's  
10 performance as Ameren Missouri's corporate services provider has saved Missouri  
11 ratepayers many millions of dollars.

12 Furthermore, Mr. Schallenberg's recommendation that a large segment of Ameren  
13 Missouri's A&G costs be disallowed is entirely unreasonable, is disconnected from and  
14 inconsistent with his own findings regarding the alleged non-compliance with the  
15 Commission's rules, and is wholly inconsistent with established ratemaking practices for  
16 establishing a utility's test year cost of service. There is no justification for the exclusion  
17 from rates of any of Ameren Missouri's costs arising from affiliate transactions.

18 **Q. Does this conclude your Rebuttal Testimony?**

19 **A. Yes, it does.**

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

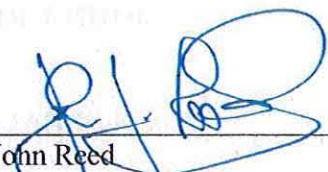
In the Matter of Union Electric Company d/b/a Ameren )  
Missouri's Tariffs to Decrease Its Revenues for ) File No. ER-2019-0335  
Electric Service. )

**AFFIDAVIT OF JOHN REED**


COMMONWEALTH OF MASSACHUSETTS )  
 ) ss  
CITY OF MARLBOROUGH )

COMES NOW John Reed, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
John Reed

Subscribed and sworn to before me this 16 day of January, 2020.

  
\_\_\_\_\_  
Notary Public

My commission expires:

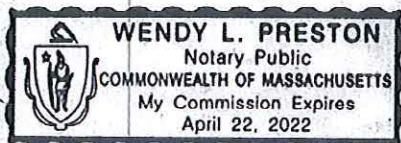


Exhibit No.:  
Issue(s): Policy and AMS  
Variance  
Witness: John J Reed  
Type of Exhibit: Direct Testimony  
Sponsoring Party: Union Electric Company  
File No.: EO-2017-0176  
Date Testimony Prepared: June 14, 2019

**DIRECT TESTIMONY**  
**OF**  
**JOHN J. REED**  
**ON BEHALF OF**  
**AMEREN MISSOURI**

**June 14, 2019**

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**DIRECT TESTIMONY**

**OF**

**JOHN J. REED**

**FILE NO. EO-2017-0176**

**I. INTRODUCTION**

1  
2 **Q. Please state your name and business address.**

3 A. My name is John J. Reed. I am President and Chief Executive Officer of Concentric Energy  
4 Advisors, Inc. ("Concentric") and CE Capital Advisors, Inc. ("CE Capital"), which has its  
5 headquarters at 293 Boston Post Road West, Suite 500, Marlborough, Massachusetts  
6 01752.

7 **Q. On whose behalf are you submitting this testimony?**

8 A. I am testifying on behalf of Union Electric Company d/b/a Ameren Missouri ("Ameren  
9 Missouri" or "the Company").

10 **Q. Please describe your educational background and professional experience in the  
11 energy and utility industries.**

12 A. I have more than 40 years of experience in the energy industry and have worked as an  
13 executive in, and consultant and economist to, the energy industry. Over the past 30 years,  
14 I have directed the energy consulting services of Concentric, Navigant Consulting, and  
15 Reed Consulting Group. I have served as Vice Chairman and Co-CEO of the nation's  
16 largest publicly-traded consulting firm and as Corporate Economist for the nation's largest  
17 gas utility.

18 I have provided regulatory policy and regulatory economics support to more than 100  
19 energy and utility clients and have provided expert testimony on regulatory, economic, and



1 financial matters on more than 200 occasions before the Federal Energy Regulatory  
2 Commission ("FERC"), Canadian regulatory agencies, state regulatory agencies, various  
3 state and federal courts, and arbitration panels in the United States and Canada. I have also  
4 previously appeared before the Missouri Public Service Commission (the "Commission")  
5 as an expert on regulation and ratemaking issues. I am a graduate of the Wharton School  
6 of Business at the University of Pennsylvania, and previously attended the University of  
7 Kansas. My curriculum vitae, as well as a listing of my prior testimonies is provided in  
8 Schedule JJR-1.

9 **Q. Please describe Concentric's activities in energy and utility engagements.**

10 A. Concentric provides financial, regulatory and economic advisory services to many energy  
11 and utility clients across North America. Our regulatory, economic, and market analysis  
12 services include utility ratemaking and regulatory advisory services, energy market  
13 assessments, market entry and exit analysis, corporate and business unit strategy  
14 development, demand forecasting, resource planning, and energy contract negotiations.  
15 Our financial advisory activities include both buy and sell side mergers, acquisition and  
16 divestiture assignments, due diligence and valuation assignments, project and corporate  
17 finance services, and transaction support services. In addition, Concentric provides  
18 litigation support services on a wide range of financial and economic issues on behalf of  
19 clients throughout North America. CE Capital is a fully-registered broker-dealer securities  
20 firm specializing in merger and acquisition activities. As CEO of CE Capital, I hold several  
21 securities licenses that cover all forms of securities and investment banking activities.

## 22 II. PURPOSE OF TESTIMONY

23 **Q. What is the purpose of your direct testimony?**

1 A. The purpose of my direct testimony is to provide my assessment and recommendation  
2 pertaining to the stipulation and agreement and the cost allocation manual ("CAM") filed  
3 by Ameren Missouri in this docket,<sup>1</sup> which is supported by the Staff of the Commission.

4 **Q. Is the purpose of this proceeding to assess and approve the dollars paid by Ameren  
5 Missouri to affiliated companies for services provided?**

6 A. No. In this proceeding the Commission has been asked to approve the CAM, which will  
7 govern interactions between Ameren Missouri and its affiliate companies, and to approve  
8 certain variances reflected in it. Ameren Missouri is also asking the Commission to  
9 formalize the commitments Ameren Missouri made in the stipulation and agreement.<sup>2</sup>  
10 The stipulation and agreement does not approve any costs or make any determinations on  
11 the need for or prudence of those costs or interactions. Such issues, if any, are left to future  
12 rate proceedings.

13 **Q. Are there Missouri legal requirements that govern a utility's transactions with  
14 affiliated companies?**

15 A. Yes, 4 CSR 240-20.015 and 4 CSR 240-40.015 of Missouri Code of State Regulations  
16 addresses affiliated transactions for electric and gas utilities, respectively. Ameren  
17 Missouri is both an electric and gas utility and the proposed CAM applies to both electric  
18 and gas utility affiliate transactions. The regulations are intended to prevent regulated  
19 utilities from subsidizing their nonregulated operations. To put another way, and as I

<sup>1</sup> It is my understanding that Ameren Missouri is requesting approval of the CAM it submitted on May 15, 2019 (covering calendar year 2018) in substitution of the CAM submitted with the stipulation and agreement. I have also reviewed the later CAM and it is in all material respects the same as the one submitted with the stipulation and agreement except for its substitution of 2018 data for the 2017 data contained in the originally-submitted CAM.

<sup>2</sup> As I understand it, given an objection to the stipulation and agreement by the Missouri Office of the Public Counsel, the Commission cannot literally "approve" the stipulation and agreement.

1 discuss below, the regulations are designed to prevent unfair preferential treatment of  
2 affiliates to the detriment of the Company's customers. In order to accomplish this  
3 objective, the rule sets forth financial and evidentiary standards and recordkeeping  
4 requirements applicable to any Commission regulated electrical corporation whenever  
5 such corporation participates in transactions with any affiliated entity (except with regard  
6 to HVAC services as defined in section 386.754, RSMo.). The rule and its effective  
7 enforcement are intended to provide the public with the assurance that their rates are not  
8 adversely impacted by nonregulated activities.

9 **Q. Has the Commission described the intent of the affiliate transaction rules in prior**  
10 **orders?**

11 A. Yes, on at least two occasions in recent years. In its July 1, 2008 Report and Order in File  
12 No. EM-2007-0374, the Commission granted Greater Missouri Operations ("GMO") and  
13 KCP&L a variance to the Affiliate Transactions Rule for all transactions between GMO  
14 and KCP&L, except for wholesale power transactions, which would be based on rates  
15 approved by the FERC. At page 264 of the Commission's Report and Order, it noted that  
16 "the purpose of the Commission's Affiliate Transactions Rule is to prevent cross-  
17 subsidization of regulated utility's non-regulated operations, not to prevent transactions at  
18 cost between two regulated affiliates." Last year when the Commission approved the  
19 merger of Great Plains Energy (KCP&L's and GMO's parent) and Westar Energy it  
20 essentially extended that variance to Westar Energy, KCP&L and GMO's affiliated utility  
21 in Kansas operating under the supervision of the Kansas Corporation Commission.

22 **Q. In this proceeding, is the Company requesting the Commission's approval of its**  
23 **CAM?**

1 A. Yes, as I noted earlier it is.

2 **Q. Does the proposed CAM request certain waivers from the requirements of 4 CSR**  
3 **240-20.015 and 4 CSR 240-40.015?**

4 A. Yes, it does. Company witnesses Tom Byrne and Laura Moore address the requested  
5 variances.

6 **Q. Is the intent of the CAM for which Commission approval has been requested to**  
7 **articulate how Ameren Missouri will comply with the affiliate transaction rules?**

8 A. Yes, it is.

9 **Q. Does the stipulation and agreement between the parties to this proceeding reflect**  
10 **certain commitments on Ameren Missouri's part?**

11 A. Yes. Per the stipulation and agreement, Ameren Missouri is committed to undertake a  
12 number of initiatives, including:<sup>3</sup>

- 13 • Putting affiliate transaction training that meets certain parameters specified in the  
14 CAM in place after obtaining the Staff's input on that training;
- 15 • Implementing a CAM Team;
- 16 • Completing a General Office Building ("GOB") space study;
- 17 • Performing annual audits (commencing in 2020 for calendar year 2019);
- 18 • Completing purchasing rate costs and inventory handling loading studies by  
19 December 31, 2019 (and results implemented in 2020);
- 20 • Putting written contracts into place with affiliates other than Ameren Services,  
21 subject, however, to any required approvals by the Illinois Commerce Commission

<sup>3</sup> Stipulation and Agreement, File No. EO-2017-0176, pp. 4-5

1 for contracts with affiliates subject to Illinois Commerce Commission jurisdiction;  
2 and  
3 • Performing a fully distributed cost study to examine whether improvements in  
4 allocation factors can be made and to examine whether a greater proportion of AMS  
5 costs can be directly charged.

6 **Q. What is the status of those requirements**

7 A. It is my understanding that all of the commitments have been met or are in the process of  
8 being met (some are future commitments and others depend on the resolution of this  
9 docket). Ameren Missouri witnesses Byrne, Moore and Hasse address the status of these  
10 commitments in their testimonies.

11 **Q. What is your overall assessment of the stipulation and agreement and proposed  
12 CAM?**

13 A. I believe the stipulation and agreement and the CAM provide an appropriate framework  
14 for managing Ameren Missouri's affiliated transactions, and provide effective protections  
15 to Ameren Missouri's customers to ensure that the need for and reasonableness of all costs  
16 stemming from affiliate transactions can be fully addressed as needed in future Ameren  
17 Missouri rate cases.

18 **III. OVERVIEW OF AMEREN MISSOURI AND KEY AFFILIATES FROM**  
19 **WHICH IT RECEIVES OR TO WHICH IT PROVIDES SERVICES**

20 **Q. Please provide an overview of Ameren Missouri.**

21 A. Ameren Missouri is an operating energy company that is part of Ameren Corporation. The  
22 Company provides energy to approximately 1.2 million electric and 130,000 natural gas

1 customers in central and eastern Missouri. The Company's service area covers 64 counties  
2 and more than 500 communities including the greater St. Louis area.

3 **Q. Please describe Ameren Corporation.**

4 A. As set forth in the CAM, Ameren Corporation ("AMC") is the parent company of Ameren  
5 Missouri and consists of AMC and all of its subsidiaries on a consolidated basis. AMC  
6 was formed in 1997 as a result of the merger of Union Electric Company and Central  
7 Illinois Public Service Company ("CIPS"). In 2003, AMC acquired Cilcorp and its  
8 operating utility Central Illinois Light Company. AMC acquired Illinois Power Company  
9 from Dynegy in 2004. AMC's Illinois utilities merged to become Ameren Illinois  
10 Company ("AIC") in 2010.

11 **Q. Does Ameren Missouri receive services from Ameren Corporation?**

12 A. No. AMC has no employees and provides no services to Ameren Missouri.

13 **Q. In addition to Ameren Missouri, what are AMC's other primary subsidiaries?**

14 A. As detailed in the CAM, AMC's principal subsidiaries are Union Electric Company d/b/a  
15 Ameren Missouri, AIC, and Ameren Transmission Company of Illinois ("ATXI"). AMC  
16 also has three wholly-owned direct FERC rate regulated subsidiaries,<sup>4</sup> and three wholly-  
17 owned direct non-state regulated subsidiaries, including Ameren Services Company  
18 ("AMS").

19 **Q. Do all of AMC's subsidiaries have employees?**

20 A. No. Only Ameren Missouri, AIC and AMS have employees.

21 **Q. Does Ameren Missouri receive services from, or provide services to, AIC?**

<sup>4</sup> Only one of the FERC rate regulated subsidiaries, ATXI, has substantial assets which include transmission lines located in Missouri which have been approved by the Commission.

1 A. Yes. As discussed in greater detail by Ameren Missouri witness Moore, there are  
2 transactions between Ameren Missouri and AIC, and as noted earlier, those will all be  
3 covered by a formal written contract once this docket is completed, subject to required ICC  
4 approval. Such transactions include activities such as intercompany billing project charges,  
5 storeroom issues and handling charges, electric service for Ameren Missouri assets in  
6 Illinois, transfers of meters and line transformers, rent, and lab testing. Ameren Missouri  
7 and AIC also provide services related to service restoration to their sister companies in  
8 emergencies, such as following severe storms.

9 **Q. Does the proposed CAM address the dealings between Ameren Missouri and AIC?**

10 A. Yes, it does.

11 **Q. Does Ameren Missouri receive services from AMS?**

12 A. Yes. As Ms. Moore testifies, nearly all transactions between Ameren Missouri and  
13 affiliated companies (97% of the dollars in 2018) pertain to corporate shared services  
14 provided by AMS to Ameren Missouri.

15 **Q. Please describe AMS.**

16 A. AMS is a Missouri corporation which provides its services at cost, without any mark-up or  
17 profit component. When Ameren Missouri and CIPS merged, AMS was formed to take  
18 advantage of synergies gained by eliminating redundant functions at both Ameren Missouri  
19 and CIPS that could more cost-effectively be combined into one service company. Those  
20 same redundancies were eliminated when Cilcorp and Illinois Power were later acquired  
21 by AMC, which allowed shared services costs to be spread over additional affiliates. AMS'  
22 services include typical corporate functions such as accounting, legal, environmental,

1 building management, shareholder services, executive management, information  
2 technology, etc.

3 **Q. Was the formation of the service company required by law?**

4 A. Yes. The Public Utility Holding Company Act of 1935 ("PUHCA") directed the United  
5 States Securities and Exchange Commission ("SEC") to flatten the corporate structure of  
6 utilities to remove unnecessary corporate layers. Individual operating utility companies  
7 were required to centralize certain business operations into central service companies, but  
8 all service companies would be subject to SEC and Federal Power Commission regulation.  
9 In 1977, the Federal Power Commission was replaced by the FERC.

10 At the time of Ameren's formation, PUHCA required the utilization of such a service  
11 company and required that services be provided at cost. As a result, when a state utility  
12 commission regulated a utility in a particular state, the ratepayers of that state would pay  
13 only the share of any common service company expenses associated with that state's  
14 electric company allocated to it under SEC-approved formulas to prevent a holding  
15 company from double recovery of its expenses when it operates in more than one state and  
16 to ensure each state paid its fair share of costs.

17 Although PUHCA has now been largely repealed, some functions formerly assigned to the  
18 SEC under PUHCA were transferred to the FERC at the time of the PUHCA repeal by  
19 Congress' adoption of the Energy Policy Act of 2005. FERC regulations adopted under  
20 that Act continue to require the use of cost-based pricing for service companies.<sup>5</sup>

<sup>5</sup> 18 CFR § 35.44 – Protection against affiliate cross-subsidization. Section (b)(3) of the rule states: "A franchised public utility that has captive customers or that owns or provides transmission service over jurisdictional transmission facilities, may only purchase or receive non-power goods and services from a centralized service company at cost."



1 **Q. Did the Missouri PSC approve the merger of Union Electric and CIPS, as well as the**  
2 **formation of AMS?**

3 A. Yes. In its 1997 order approving the merger of Ameren Missouri (then d/b/a as Union  
4 Electric) and CIPS, the Missouri Commission also approved the formation of AMS and its  
5 provision of services to Ameren Missouri.

6 **Q. Are service companies, such as AMS, common in the energy industry?**

7 A. Yes. As a result of industry mergers and acquisitions, many stand-alone, single  
8 jurisdictional energy companies have merged or been acquired. In an effort to increase  
9 efficiencies, ensure consistent practices throughout the organization, and reduce costs, the  
10 post-merger integration of common functions at an affiliated service company has been a  
11 common trend throughout the United States. Service companies similar to AMS file Form  
12 60 annual reports with the FERC. The Form 60 report is an annual regulatory support  
13 requirement under 18 CFR 369.1 for centralized service companies. The report is designed  
14 to collect financial information from centralized service companies subject to the  
15 jurisdiction of the FERC.

16 **Q. Have you prepared an exhibit identifying the service companies which filed a Form**  
17 **60 annual report, and the affiliated companies to which the service companies**  
18 **provided services, and the services provided?**

19 A. Yes, I have. Schedule JJR-2 identifies the service companies, and affiliated companies to  
20 which services are provided, as well as the services provided to the affiliated companies.

21 **Q. Please describe what Schedule JJR-2 shows.**

22 A. Schedule JJR-2 shows that 45 utility service companies filed FERC Form 60 annual  
23 reports. Reviewing these reports, the service companies provided services to 869 affiliated

1 companies, including many regulated utilities. As noted, those service companies are  
2 required by FERC regulations to provide their services at cost, just as AMS provides its  
3 services at cost to Ameren Missouri and its affiliates.

4 **Q. Based upon your review of the scope of services offered by AMS to Ameren Missouri,**  
5 **are the services provided consistent with those of other service companies in the**  
6 **energy industry?**

7 A. Yes. In my experience, the services provided by AMS to Ameren Missouri are consistent  
8 with those provided by other service companies to affiliated regulated utilities. Schedule  
9 JJR-2 further supports my experience and conclusion.

10 **Q. Based upon your experience, would you agree that the use of the shared services**  
11 **model, delivered through affiliated service companies, remains prevalent today in the**  
12 **energy industry?**

13 A. Yes. Based upon both my personal knowledge of the energy industry, as well as the  
14 number of Form 60 reports filed with the FERC, I believe it is accurate to state that service  
15 companies are widely used throughout the energy industry in the United States.

16 **Q. To what do you attribute the extensive use of service companies?**

17 A. Beyond the fact that the PUHCA required the use of service companies, many of the  
18 mergers that have been consummated in the energy industry have been premised, in part,  
19 upon the realization that the combined companies could produce savings from the  
20 elimination of duplication in public company functions and "back room," non-customer  
21 facing corporate functions. There are economies of scale that can be achieved by  
22 eliminating duplicative roles and functions when two companies merge (e.g., one  
23 accounting, human resources, information technology, procurement, etc. function).

1 Further, the staff of merged companies would most likely be able to perform required tasks  
2 with fewer staff than the individual operating companies were able to achieve. That is why  
3 parties to merger proceedings are frequently seeking to obtain commitments from the  
4 acquiring parties to pass along savings achieved as a result of the merger.

5 **Q. What are Missouri's requirements for the pricing of services between affiliated**  
6 **energy companies?**

7 A. As set forth in Section 4 CSR 240-20.015(2), Missouri statutes require that:

8 (A) A regulated electrical corporation shall not provide a financial advantage to an  
9 affiliated entity. For the purposes of this rule, a regulated electrical corporation shall  
10 be deemed to provide a financial advantage to an affiliated entity if—

11 1. It compensates an affiliated entity for goods or services above the lesser of:

12 A. The fair market price; or

13 B. The fully distributed cost to the regulated electrical corporation to  
14 provide the goods or services for itself; or

15 2. It transfers information, assets, goods or services of any kind to an affiliated  
16 entity below the greater of:

17 A. The fair market price; or

18 B. The fully distributed cost to the regulated electrical corporation.

19 The requirement that goods or services be provided by the regulated utility to an  
20 unregulated affiliated company at the greater of fair market price or the utility's fully  
21 distributed cost, while the services provided by the unregulated affiliated company to the  
22 regulated utility at the lesser of fair market price or the utility's fully distributed cost is also  
23 commonly referred to as "asymmetrical pricing."

1 **Q. Is the Company seeking a waiver from the asymmetrical pricing rule?**

2 A. Yes, it is.

3 **Q. Do you believe the cited regulations support the requested waiver?**

4 A. Yes, I do. Reviewing the rule in its totality indicates that its adoption arose from concerns  
5 that might exist if a regulated utility had affiliates whose rates (prices for goods/services it  
6 sells) were not regulated by regulatory commissions. The purpose of the provision of the  
7 rules reflects this. In addition, while the pricing and preferential treatment provisions of  
8 the rule literally appear in separate subsections of the rules, the preferential treatment  
9 provision recognizes that the kind of corporate support that AMS provides does not  
10 implicate the concerns that I believe led to the rules' adoption. Section (2)(B) of the rules  
11 state: "Except as necessary to provide corporate support functions, the regulated electrical  
12 corporation shall conduct its business in such a way as not to provide any preferential  
13 service, information or treatment to an affiliated entity over another party at any time"  
14 (emphasis added). As defined in Section (1)(D) "Corporate support means joint corporate  
15 oversight, governance, support systems and personnel, involving payroll, shareholder  
16 services, financial reporting, human resources, employee records, pension management,  
17 legal services, and research and development activities."  
18 The above language supports the conclusion that the Commission wasn't – and shouldn't  
19 be – concerned with strict adherence to the aforementioned asymmetrical pricing  
20 requirements for the kind of services provided by AMS. The objective of these rules is  
21 clearly to prevent unfair preferential treatment to an affiliate where such treatment would  
22 be detrimental to the Company's customers. This objective can be met by employing the

1 fully distributed cost of providing such services, as long as the fully distributed cost  
2 standard is applied to all affiliates.

3 **Q. Are AMS' services provided to Ameren Missouri and its other affiliated companies**  
4 **at the fully distributed cost of providing those services?**

5 A. Yes, they are.

6 **Q. Does 4 CSR 240-20.015 and 4 CSR 40.015 define fully distributed cost?**

7 A. Yes. Section (1)(F) of each rule defines fully distributed cost as "a methodology that  
8 examines all costs of an enterprise in relation to all the goods and services that are  
9 produced. Fully distributed cost requires recognition of all costs incurred directly or  
10 indirectly used to produce a good or service. Costs are assigned either through a direct or  
11 allocated approach. Costs that cannot be directly assigned or indirectly allocated (e.g.,  
12 general and administrative) must be included in the fully distributed cost calculation  
13 through a general allocation."

14 **Q. Does Ameren Services Company profit from the services provided to its affiliated**  
15 **companies?**

16 A. No. All AMS charges reflect the direct cost of providing that service or product. There is  
17 no profit margin built into the charges, and AMS operates on a zero profit basis.

18 **Q. Are the costs of AMS' services therefore the same as if Ameren Missouri were to self**  
19 **provide the services?**

20 A. The services are, at worst, the same as if Ameren Missouri were to self provide the services.  
21 It is highly likely, however, that due to the economies of scale realized by centralizing the  
22 shared services at AMS, the services are provided at a cost lower than if Ameren Missouri  
23 were to self provide the services on a standalone basis.

1 **Q. Please explain.**

2 A. There are inherent efficiencies realized by consolidating common functions at one  
3 company, as opposed to requiring each operating company to individually perform each  
4 service. Given that AMS provides similar services to Ameren Missouri, AIC, and other  
5 affiliated companies, AMS is likely able to perform the required services with fewer  
6 people, and thus at a lower cost, than if each Ameren operating company were to be  
7 individually fully staffed to provide all services. In other words, there are economies of  
8 scale realized by consolidating similar functions across the AMC companies.

9 **Q. Is it possible that by centralizing the shared services Ameren Missouri could  
10 potentially be subsidizing non-regulated affiliates?**

11 A. No. First, AMC has no material non-regulated operations. Second, as previously  
12 mentioned, AMS' services are provided at cost, which is determined by prevailing  
13 wages/benefits and actual incurred expenses. Therefore, there is no issue of potential  
14 subsidies from ratepayers to unregulated affiliates. The pricing of affiliated services only  
15 has a material effect on which jurisdiction's customers are responsible for, and benefit  
16 from, the cost of providing a service. Essentially, all costs are attributable to one set of  
17 regulated customers or the other (i.e., Ameren Missouri versus AIC versus ATXI). Put  
18 another way, the cost standard for affiliate transactions is appropriate because the question  
19 being addressed is what costs (which are in any event consistent with the market) should  
20 be included in the rates for each set of customers in the AMC utility family.

21 **Q. Aside from the fact that AMC has no significant non-regulated companies, are there  
22 other reasons the requested variance regarding pricing is reasonable?**

1 A. Yes, as I will discuss in greater detail below, the nature of the compensation paid to AMS  
2 employees and how it procures goods and services it uses to provide service to Ameren  
3 Missouri and its affiliates support the conclusion that the central purpose of the rules will  
4 be preserved with the requested variance in place.

5 **Q. What additional steps does the stipulation and agreement call for Ameren Missouri**  
6 **to take to ensure the reasonableness of the cost of services provided by AMS to its**  
7 **operating companies?**

8 A. As called for in the stipulation and agreement, Ameren Missouri has formed a CAM team  
9 and implemented extensive reporting and recordkeeping requirements which appear to go  
10 well beyond existing regulatory requirements, to continually oversee the dealings between  
11 AMS and the operating companies. Based upon my discussions with the Company's CAM  
12 team, I have concluded that Ameren Missouri's approach, as established by the stipulation  
13 and agreement, will provide a highly effective means of insuring that Ameren Missouri  
14 and its affiliates will fully comply with the CAM procedures.

15 **Q. Are AMS' costs billed to affiliated companies subject to regulatory review other than**  
16 **by the Missouri Commission?**

17 A. Yes. AMS' costs billed to its affiliated FERC rate regulated subsidiaries have been, and  
18 continue to be, reviewed by the FERC. The FERC has never challenged or disallowed any  
19 of AMS' charges to the Company's transmission customers.

20 The Illinois Commerce Commission ("ICC") also reviews AMS' charges to AIC during  
21 rate proceedings. The ICC has accepted AMS' charges, as well as the allocation  
22 methodology, which reflects fully distributed cost as called for in the stipulation and  
23 agreement.

1 **Q. Would it be practical for the Commission to review and approve each transaction**  
2 **between Ameren Missouri and its affiliated companies?**

3 A. No. A detailed review of each transaction between Ameren Missouri and its affiliated  
4 companies would mire the Commission and the Company in endless and ongoing reviews  
5 each year as part of monitoring affiliate transaction rule compliance. In a given year, the  
6 transactions would number in the tens of thousands (e.g., every instance where an AMS  
7 employee provided work for Ameren Missouri) and involve dozens of functional areas.  
8 The CAM establishes appropriate safeguards, and the Commission has the opportunity to  
9 review affiliate costs and associated allocation factors in rate proceedings.

10 **IV. COST ALLOCATION MANUAL**

11 **Q. What is the purpose of Ameren Missouri's CAM?**

12 A. Ameren Missouri's CAM and the reporting it requires provides transparency into processes  
13 and procedures that govern how costs are determined and defined, allocated and assigned  
14 to Ameren Missouri and its affiliated companies and defines how "fair market price" and  
15 "fully distributed cost" are calculated. Further, the CAM helps prevent the regulated  
16 utilities from subsidizing non-regulated operations.

17 **Q. Have you reviewed Ameren Missouri's proposed CAM that is the subject of this**  
18 **proceeding?**

19 A. Yes, I have.

20 **Q. What is your independent assessment of the CAM that has been reviewed, commented**  
21 **on and agreed to by parties to this proceeding?**

22 A. I found Ameren Missouri's CAM to be comprehensive, understandable, logical,  
23 straightforward, and in compliance with the Commission's Affiliate Transactions Rules. I



1 believe the CAM provides the necessary safeguards to protect Ameren Missouri's  
2 customers from potential harm from dealings between Ameren Missouri and its affiliated  
3 companies. I also found the CAM to be consistent with if not more robust than those of  
4 other companies which I have reviewed.

5 **Q. As you reviewed Ameren Missouri's CAM, what were some of your observations of**  
6 **the document?**

7 A. I found that the CAM addressed the key issues that are typically addressed in other  
8 regulated companies' CAMs as well as issues that most frequently concern commissions  
9 and customers.

10 Commissions and interested parties are typically focused on issues related to customer  
11 protections, the pricing of services between regulated and unregulated affiliates, as well as  
12 the transfer of assets between affiliated companies, preferential treatment afforded to  
13 affiliates of the utility, affiliate marketing materials, record keeping, and training of  
14 employees on the requirements of the affiliate rules. Ameren Missouri's proposed CAM  
15 appropriately addresses each of these issues.

16 **Q. You earlier discussed the stipulation and agreement that has been filed with the**  
17 **Commission in support of the adoption of Ameren Missouri's CAM. Have you**  
18 **reviewed the stipulation and agreement?**

19 A. Yes, I have.

20 **Q. In the stipulation and agreement, do the parties support a waiver from Section 4 CSR**  
21 **240-20.015(2) and 4 CSR 240-40.015(2) standards for Ameren Missouri?**

22 A. Yes, they do.

23 **Q. What are those standards?**

1 A. The section requires that a regulated electrical corporation shall not provide a financial  
2 advantage to an affiliated entity. As discussed earlier, this section of the code employs the  
3 asymmetrical pricing rule which is designed to avoid any subsidies from regulated utility  
4 customers to the unregulated affiliates when subsidy concerns might exist.

5 **Q. What is the nature of the waiver that the parties to the stipulation and agreement**  
6 **support?**

7 A. As discussed earlier, the settling parties support a waiver from the requirement that goods  
8 and services be provided at the lower of fair market price or fully distributed cost  
9 requirement, i.e. the imposition of the asymmetrical pricing rule.

10 **Q. Please explain.**

11 A. The current requirement is that the services that Ameren Missouri receives from AMS be  
12 priced at the lower of fair market price or fully distributed cost. Proof of compliance with  
13 the fair market price requirement can be interpreted (and other provisions of the rules  
14 confirm this interpretation) to require that AMC perpetually solicit bids from non-affiliated  
15 companies to compare to AMS' costs of goods and services.

16 The cost of goods and services provided by AMS to its affiliated companies consists of  
17 two primary cost components – (1) wages and benefits of AMS employees and (2) goods  
18 and materials.

19 With regard to wages and benefits, employees of AMC subsidiaries receive market-based  
20 wages and benefits. To ensure that the employees are provided a reasonable compensation  
21 package, the AMS Human Resources Department routinely benchmarks total  
22 compensation packages (i.e., wages and benefits) against local, regional and national  
23 companies. Its goal is to provide a total compensation package that represents the median

1 of the market (i.e., 50<sup>th</sup> percentile). Therefore, the total cost of Ameren Missouri's and  
2 AMS' total wages and benefits are reflective of the market.

3 Further, AMS provides its goods and services to Ameren Missouri at cost (i.e., without  
4 mark-up or profit). All other non-affiliated service providers' services would include a  
5 mark-up and/or profit component in the pricing of their goods and services.

6 In addition, AMS' procurement of labor and other goods and services at market prices and  
7 its subsequent charging for its services at cost means that the cost of goods and services  
8 provided to Ameren Missouri by AMS can reasonably be concluded to be both priced at  
9 market and priced at cost. This is because the wages and benefits paid to all employees of  
10 the Ameren companies are benchmarked at the 50<sup>th</sup> percentile of market and, similarly,  
11 AMS uses procurement procedures and policies for non-employee-related costs also  
12 designed to ensure that good and services are obtained at market prices. Therefore, the  
13 need to perpetually solicit bids to ensure the reasonableness of the Company's wages,  
14 benefits, and cost of goods and materials would be unproductive and burdensome, potential  
15 bidders would likely stop bidding after a while, and doing so in any event would be contrary  
16 to the retention of a high-performing workforce and would increase the total cost of AMS'  
17 services provided to Ameren Missouri. In lieu of the imposition of the asymmetrical  
18 pricing standard and burdensome and likely impractical documentation requirements, the  
19 stipulation and agreement calls for reliance on fully distributed cost for affiliate services.

20 **Q. Can you please elaborate on what is meant by fully distributed cost?**

21 **A.** Yes. Fully distributed cost simply means that all costs are considered in the pricing of  
22 services and are charged to the beneficiaries of the services provided. The use of fully-  
23 distributed cost reflects the economies of scale and scope, which means that fully

1 distributed cost is less than stand-alone cost, which provides direct customer benefits from  
2 AMS' existence.

3 **Q. Are there additional safeguards associated with AMS' services?**

4 A. Yes. The stipulation and agreement specifically preserve audit rights whereby all rights  
5 are reserved for parties to challenge the reasonableness and prudence of AMS' costs in rate  
6 proceedings, including any claims about how those costs are allocated. Nothing in the  
7 CAM or in the terms of the requested variances affects these rights. These procedures  
8 provide an effective and transparent basis for ensuring that costs charged to customers do  
9 not create cross subsidies, impair competition or lead to unreasonable rates. The CAM,  
10 along with the Company's reliance on market-based compensation, represents a sound  
11 basis for granting a waiver of the need to apply asymmetrical pricing, and allows AMS and  
12 Ameren Missouri to comply with federal regulations.

13 **Q. Is the requested waiver consistent with FERC's affiliate transactions rules?**

14 A. Yes, it is. As previously mentioned, federal law requires that all affiliated service  
15 companies provide "non-power" services at cost to any utility that has captive customers  
16 or that provides service over jurisdictional transmission facilities. The asymmetric pricing  
17 rule, such as established by Missouri rules, therefore should not apply to services provided  
18 under a service company structure.

19 **Q. Has the Missouri Public Service Commission approved a similar variance for other  
20 utilities it regulates?**

21 A. Yes. In its July 1, 2008 Report and Order in File No. EM-2007-0374, the Missouri Public  
22 Service Commission granted GMO and KCP&L a variance to the Affiliate Transactions  
23 Rule for all transactions between GMO and KCP&L except for wholesale power

1 transactions. At paragraph 589, page 187, of the MoPSC Report and Order, the MoPSC  
2 noted that "(r)ather than the asymmetrical pricing prescribed in the rule, the Applicants  
3 request that the Commission grant a waiver from the rules to the extent necessary to allow  
4 KCPL and Aquila to provide services at fully distributed costs, except for wholesale power  
5 transactions, which would be based on rates approved by FERC."<sup>6</sup> That waiver was  
6 granted by the MoPSC. As earlier noted, that waiver has been extended to dealings between  
7 KCP&L, GMO, and Westar.

8 **Q. Does AMS benchmark its costs against that of other companies, and what relevance**  
9 **does this have to the requested waivers?**

10 A. While I believe that the fact that AMS' services are provided at cost, and that those services  
11 are provided by employees that are provided wages and benefits that reflect the median of  
12 that offered by other companies in the Company's service territory should be sufficient,  
13 Ameren Missouri and AMS also participate in various benchmarking studies comparing  
14 their costs to those of other companies.

15 **Q. Are there other protections included in the CAM that protect Ameren Missouri's**  
16 **customers?**

17 A. Yes. In addition to the other safeguards that I have discussed, there are additional  
18 requirements included in the CAM which I believe provide additional safeguards for  
19 Ameren Missouri's customers.

20 **Q. What are those additional safeguards?**

21 A. AMS and Ameren Missouri: utilize an annual planning and procurement process in which  
22 representatives of AMS and Ameren Missouri evaluate the need for services for the

<sup>6</sup> Report and Order, File No. EM-2007-0374.

1 upcoming year. Therefore, Ameren Missouri has control over both the level and cost of  
2 services to be provided to or procured from affiliates in the upcoming year.

3 Finally, AMS' invoices are routinely reviewed and must be approved by Ameren Missouri.

4 This requirement ensures that Ameren Missouri is only charged for the services that it  
5 agreed to, for the level of services requested, and that the costs are charged to Ameren  
6 Missouri based upon the agreed upon allocation factors. These are important controls to  
7 ensure management oversight and accountability.

8 **Q. What is your recommendation in this proceeding?**

9 A. Given that AMS is providing its services almost exclusively to regulated affiliates at cost  
10 with no markup and given the fact that there is a strong case that cost and market are the  
11 same, granting of the requested variance presents no real issue of potential subsidies from  
12 ratepayers. The pricing of affiliate services now only has a material effect on which  
13 jurisdictions customers are responsible for which costs. All of the costs are attributable to  
14 one set of regulated customers or another. Since the issues have evolved from concerns  
15 about cross-subsidization of unregulated affiliates to standard questions of jurisdictional  
16 separation, the procedures that are incorporated into the CAM should evolve as well. I  
17 recommend that the Missouri Public Service Commission approve Ameren Missouri's  
18 proposed CAM and the requested variances and otherwise order compliance with the  
19 commitments Ameren Missouri made in the stipulation and agreement.

20 **Q. Does this conclude your direct testimony?**

21 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of a Union Electric Company d/b/a )  
Ameren Missouri's Cost Allocation Manual (CAM). ) File No. EO-2017-0176

AFFIDAVIT OF JOHN REED

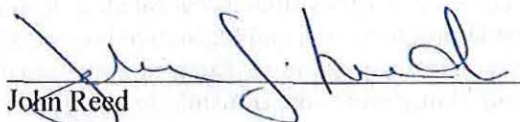
STATE OF Massachusetts )  
 ) SS  
CITY OF Marlborough )

John Reed, being first duly sworn on his oath, states:

1. My name is John Reed. I work in the City of Marlborough, MA, and I am employed  
by Concentric Energy Advisors, Inc. as Chairman and Chief Executive Officer.

2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on  
behalf of Union Electric Company d/b/a Ameren Missouri consisting of 23 pages and  
Schedule(s) JJR-D1 to JJR-D2, all of which have been prepared in written  
form for introduction into evidence in the above-referenced docket.

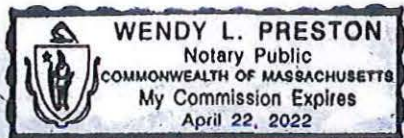
3. I hereby swear and affirm that my answers contained in the attached testimony to  
the questions therein propounded are true and correct.

  
John Reed

Subscribed and sworn to before me this 12 day of June, 2019.

  
Notary Public

My commission expires:





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**John J. Reed**  
**Chairman and Chief Executive Officer**

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John J. Reed is a financial and economic consultant with more than 42 years of experience in the energy industry. Mr. Reed has also been the CEO of an NASD member securities firm, and Co-CEO of the nation's largest publicly traded management consulting firm (NYSE: NCI). He has provided advisory services in the areas of mergers and acquisitions, asset divestitures and purchases, strategic planning, project finance, corporate valuation, energy market analysis, rate and regulatory matters and energy contract negotiations to clients across North and Central America. Mr. Reed's comprehensive experience includes the development and implementation of nuclear, fossil, and hydroelectric generation divestiture programs with an aggregate valuation in excess of \$20 billion. Mr. Reed has also provided expert testimony on financial and economic matters on more than 400 occasions before the FERC, Canadian regulatory agencies, state utility regulatory agencies, various state and federal courts, and before arbitration panels in the United States and Canada. After graduation from the Wharton School of the University of Pennsylvania, Mr. Reed joined Southern California Gas Company, where he worked in the regulatory and financial groups, leaving the firm as Chief Economist in 1981. He served as executive and consultant with Stone & Webster Management Consulting and R.J. Rudden Associates prior to forming REED Consulting Group (RCG) in 1988. RCG was acquired by Navigant Consulting in 1997, where Mr. Reed served as an executive until leaving Navigant to join Concentric as Chairman and Chief Executive Officer.

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**REPRESENTATIVE PROJECT EXPERIENCE**

**Executive Management**

As an executive-level consultant, worked with CEOs, CFOs, other senior officers, and Boards of Directors of many of North America's top electric and gas utilities, as well as with senior political leaders of the U.S. and Canada on numerous engagements over the past 25 years. Directed merger, acquisition, divestiture, and project development engagements for utilities, pipelines and electric generation companies, repositioned several electric and gas utilities as pure distributors through a series of regulatory, financial, and legislative initiatives, and helped to develop and execute several "roll-up" or market aggregation strategies for companies seeking to achieve substantial scale in energy distribution, generation, transmission, and marketing.

**Financial and Economic Advisory Services**

Retained by many of the nation's leading energy companies and financial institutions for services relating to the purchase, sale or development of new enterprises. These projects included major new gas pipeline projects, gas storage projects, several non-utility generation projects, the purchase and sale of project development and gas marketing firms, and utility acquisitions. Specific services provided include the development of corporate expansion plans, review of acquisition candidates, establishment of divestiture standards, due diligence on acquisitions or financing, market entry or expansion studies, competitive assessments, project financing studies, and negotiations relating to these transactions.





### **Litigation Support and Expert Testimony**

Provided expert testimony on more than 400 occasions in administrative and civil proceedings on a wide range of energy and economic issues. Clients in these matters have included gas distribution utilities, gas pipelines, gas producers, oil producers, electric utilities, large energy consumers, governmental and regulatory agencies, trade associations, independent energy project developers, engineering firms, and gas and power marketers. Testimony has focused on issues ranging from broad regulatory and economic policy to virtually all elements of the utility ratemaking process. Also frequently testified regarding energy contract interpretation, accepted energy industry practices, horizontal and vertical market power, quantification of damages, and management prudence. Has been active in regulatory contract and litigation matters on virtually all interstate pipeline systems serving the U.S. Northeast, Mid-Atlantic, Midwest, and Pacific regions.

Also served on FERC Commissioner Terzic's Task Force on Competition, which conducted an industry-wide investigation into the levels of and means of encouraging competition in U.S. natural gas markets and served on a "Blue Ribbon" panel established by the Province of New Brunswick regarding the future of natural gas distribution service in that province.

### **Resource Procurement, Contracting and Analysis**

On behalf of gas distributors, gas pipelines, gas producers, electric utilities, and independent energy project developers, personally managed or participated in the negotiation, drafting, and regulatory support of hundreds of energy contracts, including the largest gas contracts in North America, electric contracts representing billions of dollars, pipeline and storage contracts, and facility leases.

These efforts have resulted in bringing large new energy projects to market across North America, the creation of hundreds of millions of dollars in savings through contract renegotiation, and the regulatory approval of a number of highly contested energy contracts.

### **Strategic Planning and Utility Restructuring**

Acted as a leading participant in the restructuring of the natural gas and electric utility industries over the past fifteen years, as an adviser to local distribution companies, pipelines, electric utilities, and independent energy project developers. In the recent past, provided services to most of the top 50 utilities and energy marketers across North America. Managed projects that frequently included the redevelopment of strategic plans, corporate reorganizations, the development of multi-year regulatory and legislative agendas, merger, acquisition and divestiture strategies, and the development of market entry strategies. Developed and supported merchant function exit strategies, marketing affiliate strategies, and detailed plans for the functional business units of many of North America's leading utilities.

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## **PROFESSIONAL HISTORY**

### **Concentric Energy Advisors, Inc. (2002 - Present)**

Chairman and Chief Executive Officer

### **CE Capital Advisors (2004 - Present)**

Chairman, President, and Chief Executive Officer



**Navigant Consulting, Inc. (1997 - 2002)**

President, Navigant Energy Capital (2000 - 2002)

Executive Director (2000 - 2002)

Co-Chief Executive Officer, Vice Chairman (1999 - 2000)

Executive Managing Director (1998 - 1999)

President, REED Consulting Group, Inc. (1997 - 1998)

**REED Consulting Group (1988 - 1997)**

Chairman, President and Chief Executive Officer

**R.J. Rudden Associates, Inc. (1983 - 1988)**

Vice President

**Stone & Webster Management Consultants, Inc. (1981 - 1983)**

Senior Consultant

Consultant

**Southern California Gas Company (1976 - 1981)**

Corporate Economist

Financial Analyst

Treasury Analyst

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**EDUCATION AND CERTIFICATION**

B.S., Economics and Finance, Wharton School, University of Pennsylvania, 1976

Licensed Securities Professional: NASD Series 7, 63, 24, 79 and 99 Licenses

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**BOARDS OF DIRECTORS (PAST AND PRESENT)**

Concentric Energy Advisors, Inc.

Navigant Consulting, Inc.

Navigant Energy Capital

Nukem, Inc.

New England Gas Association

R. J. Rudden Associates

REED Consulting Group



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**AFFILIATIONS**

American Gas Association

Energy Bar Association

Guild of Gas Managers

International Association of Energy Economists

Northeast Gas Association

Society of Gas Lighters

Society of Utility and Regulatory Financial Analysts

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**ARTICLES AND PUBLICATIONS**

"Maximizing U.S. federal loan guarantees for new nuclear energy," *Bulletin of the Atomic Scientists* (with John C. Slocum), July 29, 2009

"Smart Decoupling - Dealing with unfunded mandates in performance-based ratemaking," *Public Utilities Fortnightly*, May 2012



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
<b>Alaska Regulatory Commission</b>				
Chugach Electric	12/86	Chugach Electric	Docket No. U-86-11	Cost Allocation
Chugach Electric	5/87	Enstar Natural Gas Company	Docket No. U-87-2	Tariff Design
Chugach Electric	12/87	Enstar Natural Gas Company	Docket No. U-87-42	Gas Transportation
Chugach Electric	11/87 2/88	Chugach Electric	Docket No. U-87-35	Cost of Capital
Anchorage Municipal Light & Power	9/17	Anchorage Municipal Light & Power	Docket No. U-16-094 Docket No. U-17-008	Project Prudence
<b>Alberta Utilities Commission</b>				
Alberta Utilities (AltaLink, EPCOR, ATCO, ENMAX, FortisAlberta, AltaGas)	1/13	Alberta Utilities	Application 1566373, Proceeding ID 20	Stranded Costs
<b>Arizona Corporation Commission</b>				
Tucson Electric Power	7/12	Tucson Electric Power	Docket No. E- 01933A-12-0291	Cost of Capital
UNS Energy and Fortis Inc.	1/14	UNS Energy, Fortis Inc.	Docket No. E- 04230A-00011 and Docket No. E- 01933A-14-0011	Merger
<b>California Energy Commission</b>				
Southern California Gas Co.	8/80	Southern California Gas Co.	Docket No. 80-BR-3	Gas Price Forecasting
<b>California Public Utility Commission</b>				
Southern California Gas Co.	3/80	Southern California Gas Co.	TY 1981 G.R.C.	Cost of Service, Inflation
Pacific Gas Transmission Co.	10/91 11/91	Pacific Gas & Electric Co.	App. 89-04-033	Rate Design
Pacific Gas Transmission Co.	7/92	Southern California Gas Co.	A. 92-04-031	Rate Design
San Diego Gas & Electric Company	4/19	San Diego Gas & Electric Company	A. 19-04-XXX	Risk Premium, ROE



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
<b>Colorado Public Utilities Commission</b>				
AMAX Molybdenum	2/90	Commission Rulemaking	Docket No. 89R-702G	Gas Transportation
AMAX Molybdenum	11/90	Commission Rulemaking	Docket No. 90R-508G	Gas Transportation
Xcel Energy	8/04	Xcel Energy	Docket No. 031-134E	Cost of Debt
Public Service Company of Colorado	6/17	Public Service Company of Colorado	Docket No. 17AL-0363G	Return on Equity (Gas)
<b>CT Public Utilities Regulatory Authority</b>				
Connecticut Natural Gas	12/88	Connecticut Natural Gas	Docket No. 88-08-15	Gas Purchasing Practices
United Illuminating	3/99	United Illuminating	Docket No. 99-03-04	Nuclear Plant Valuation
Southern Connecticut Gas	2/04	Southern Connecticut Gas	Docket No. 00-12-08	Gas Purchasing Practices
Southern Connecticut Gas	4/05	Southern Connecticut Gas	Docket No. 05-03-17	LNG/Trunkline
Southern Connecticut Gas	5/06	Southern Connecticut Gas	Docket No. 05-03-17PH01	LNG/Trunkline
Southern Connecticut Gas	8/08	Southern Connecticut Gas	Docket No. 06-05-04	Peaking Service Agreement
SJW Group and Connecticut Water Service	4/19	SJW Group and Connecticut Water Service	Docket 19-04-XX	Customer Benefits, Public Interest
<b>District of Columbia PSC</b>				
Potomac Electric Power Company	3/99 5/99 7/99	Potomac Electric Power Company	Docket No. 945	Divestiture of Gen. Assets & Purchase Power Contracts
AltaGas Ltd./WGL Holdings	4/17 8/17 10/17	AltaGas Ltd./WGL Holdings	Docket No. 1142	Merger Standards, Public Interest Standard
<b>Federal Energy Regulatory Commission</b>				
Safe Harbor Water Power Corp.	8/82	Safe Harbor Water Power Corp.		Wholesale Electric Rate Increase
Western Gas Interstate Company	5/84	Western Gas Interstate Company	Docket No. RP84-77	Load Forecast Working Capital



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Southern Union Gas	4/87 5/87	El Paso Natural Gas Company	Docket No. RP87-16-000	Take-or-Pay Costs
Connecticut Natural Gas	11/87	Penn-York Energy Corporation	Docket No. RP87-78-000	Cost Allocation/Rate Design
AMAX Magnesium	12/88 1/89	Questar Pipeline Company	Docket No. RP88-93-000	Cost Allocation/Rate Design
Western Gas Interstate Company	6/89	Western Gas Interstate Company	Docket No. RP89-179-000	Cost Allocation/Rate Design, Open-Access Transportation
Associated CD Customers	12/89	CNG Transmission	Docket No. RP88-211-000	Cost Allocation/Rate Design
Utah Industrial Group	9/90	Questar Pipeline Company	Docket No. RP88-93-000, Phase II	Cost Allocation/Rate Design
Iroquois Gas Trans. System	8/90	Iroquois Gas Transmission System	Docket No. CP89-634-000/001; CP89-815-000	Gas Markets, Rate Design, Cost of Capital, Capital Structure
Boston Edison Company	1/91	Boston Edison Company	Docket No. ER91-243-000	Electric Generation Markets
Cincinnati Gas and Electric Co., Union Light, Heat and Power Company, Lawrenceburg Gas Company	7/91	Texas Gas Transmission Corp.	Docket No. RP90-104-000, RP88-115-000, RP90-192-000	Cost Allocation, Rate Design, Comparability of Service
Ocean State Power II	7/91	Ocean State Power II	ER89-563-000	Competitive Market Analysis, Self-dealing
Brooklyn Union/PSE&G	7/91	Texas Eastern	RP88-67, et al	Market Power, Comparability of Service
Northern Distributor Group	9/92 11/92	Northern Natural Gas Company	RP92-1-000, et al	Cost of Service
Canadian Association of Petroleum Producers and Alberta Pet. Marketing Comm.	10/92 7/97	Lakehead Pipe Line Co. L.P.	IS92-27-000	Cost Allocation, Rate Design
Colonial Gas, Providence Gas	7/93 8/93	Algonquin Gas Transmission	RP93-14	Cost Allocation, Rate Design



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Iroquois Gas Transmission	94	Iroquois Gas Transmission	RP94-72-000	Cost of Service, Rate Design
Transco Customer Group	1/94	Transcontinental Gas Pipeline Corporation	Docket No. RP92-137-000	Rate Design, Firm to Wellhead
Pacific Gas Transmission	2/94 3/95	Pacific Gas Transmission	Docket No. RP94-149-000	Rolled-In vs. Incremental Rates, Rate Design
Tennessee GSR Group	1/95 3/95 1/96	Tennessee Gas Pipeline Company	Docket Nos. RP93-151-000, RP94-39-000, RP94-197-000, RP94-309-000	GSR Costs
PG&E and SoCal Gas	8/96 9/96	El Paso Natural Gas Company	RP92-18-000	Stranded Costs
Iroquois Gas Transmission System, L.P.	97	Iroquois Gas Transmission System, L.P.	RP97-126-000	Cost of Service, Rate Design
BEC Energy - Commonwealth Energy System	2/99	Boston Edison Company/ Commonwealth Energy System	EC99-33-000	Market Power Analysis - Merger
Central Hudson Gas & Electric, Consolidated Co. of New York, Niagara Mohawk Power Corporation, Dynegy Power Inc.	10/00	Central Hudson Gas & Electric, Consolidated Co. of New York, Niagara Mohawk Power Corporation, Dynegy Power Inc.	Docket No. EC01-7-000	Market Power 203/205 Filing
Wyckoff Gas Storage	12/02	Wyckoff Gas Storage	CP03-33-000	Need for Storage Project
Indicated Shippers/Producers	10/03	Northern Natural Gas	Docket No. RP98-39-029	Ad Valorem Tax Treatment
Maritimes & Northeast Pipeline	6/04	Maritimes & Northeast Pipeline	Docket No. RP04-360-000	Rolled-In Rates
ISO New England	8/04 2/05	ISO New England	Docket No. ER03-563-030	Cost of New Entry
Transwestern Pipeline Company, LLC	9/06	Transwestern Pipeline Company, LLC	Docket No. RP06-614-000	Business Risk
Portland Natural Gas Transmission System	6/08	Portland Natural Gas Transmission System	Docket No. RP08-306-000	Market Assessment, Natural Gas Transportation, Rate Setting



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Portland Natural Gas Transmission System	5/10 3/11 4/11	Portland Natural Gas Transmission System	Docket No. RP10-729-000	Business Risks, Extraordinary and Non-recurring Events Pertaining to Discretionary Revenues
Morris Energy	7/10	Morris Energy	Docket No. RP10-79-000	Impact of Preferential Rate
Gulf South Pipeline	10/14	Gulf South Pipeline	Docket No. RP15-65-000	Business Risk, Rate Design
BNP Paribas Energy Trading, GP South Jersey Resource Group, LLC	2/15	Transcontinental Gas Pipe Line Corporation	Docket No. RP06-569-008 and RP07-376-005	Regulatory Policy, Incremental Rates, Stacked Rate
Tallgrass Interstate Gas Transmission, LLC	10/15 12/15	Tallgrass Interstate Gas Transmission, LLC	Docket No. RP16-137-000	Market Assessment, Rate Design, Rolled-in Rate Treatment
<b>Florida Public Service Commission</b>				
Florida Power and Light Co.	10/07	Florida Power & Light Co.	Docket No. 070650-EI	Need for New Nuclear Plant
Florida Power and Light Co.	5/08	Florida Power & Light Co.	Docket No. 080009-EI	New Nuclear Cost Recovery, Prudence
Florida Power and Light Co.	3/09 8/09	Florida Power & Light Co.	Docket No. 080677-EI	Benchmarking in Support of ROE
Florida Power and Light Co.	3/09 5/09 8/09	Florida Power & Light Co.	Docket No. 090009-EI	New Nuclear Cost Recovery, Prudence
Florida Power and Light Co.	3/10 5/10 8/10	Florida Power & Light Co.	Docket No. 100009-EI	New Nuclear Cost Recovery, Prudence
Florida Power and Light Co.	3/11 7/11	Florida Power & Light Co.	Docket No. 110009-EI	New Nuclear Cost Recovery, Prudence
Florida Power and Light Co.	3/12 7/12	Florida Power & Light Co.	Docket No. 120009-EI	New Nuclear Cost Recovery, Prudence





SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Florida Power and Light Co.	3/12 8/12	Florida Power & Light Co.	Docket No. 120015-EI	Benchmarking in Support of ROE
Florida Power and Light Co.	3/13 7/13	Florida Power & Light Co.	Docket No. 130009	New Nuclear Cost Recovery, Prudence
Florida Power and Light Co.	3/14	Florida Power & Light Co.	Docket No. 140009	New Nuclear Cost Recovery, Prudence
Florida Power and Light Co.	3/15 7/15	Florida Power & Light Co.	Docket No. 150009	New Nuclear Cost Recovery, Prudence
Florida Power and Light Co.	10/15	Florida Power and Light Co.	Docket No. 150001	Recovery of Replacement Power Costs
Florida Power and Light Co.	3/16	Florida Power & Light Co.	Docket No. 160021-EI	Benchmarking in Support of ROE
<b>Florida Senate Committee on Communication, Energy and Utilities</b>				
Florida Power and Light Co.	2/09	Florida Power & Light Co.		Securitization
<b>Hawai'i Public Utility Commission</b>				
Hawaiian Electric Light Company, Inc.	6/00	Hawaiian Electric Light Company, Inc.	Docket No. 99-0207	Standby Charge
NextEra Energy, Inc. Hawaiian Electric Companies	4/15 8/15 10/15	Hawaiian Electric Company, Inc.; Hawaii Electric Light Company, Inc., Maui Electric Company, Ltd., NextEra Energy, Inc.	Docket No. 2015-0022	Merger Application
<b>Idaho Public Utilities Commission</b>				
Hydro One Limited and Avista Corporation	9/18 11/18	Hydro One Limited and Avista Corporation	Case No. AVU-E-17-09 Case No. AVU-G-17-05	Governance, Financial Integrity and Ring-fencing Merger Commitments
<b>Illinois Commerce Commission</b>				



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Renewables Suppliers (Algonquin Power Co., EDP Renewables North America, Invenergy, NextEra Energy Resources)	3/14	Renewables Suppliers	Docket No. 13-0546	Application for Rehearing and Reconsideration, Long-term Purchase Power Agreements
WE Energies Corporation	8/14 12/14 2/15	WE Energies/Integrus	Docket No. 14-0496	Merger Application
<b>Indiana Utility Regulatory Commission</b>				
Northern Indiana Public Service Company	10/01	Northern Indiana Public Service Company	Cause No. 41746	Valuation of Electric Generating Facilities
Northern Indiana Public Service Company	1/08 3/08	Northern Indiana Public Service Company	Cause No. 43396	Asset Valuation
Northern Indiana Public Service Company	8/08	Northern Indiana Public Service Company	Cause No. 43526	Fair Market Value Assessment
Indianapolis Power & Light Company	12/14	Indianapolis Power & Light Company	Cause No. 44576	Asset Valuation
Indianapolis Power & Light Company	12/16	Indianapolis Power & Light Company	Cause No. 44893	Rate Recovery for New Plant Additions, Valuation of Electric Generating Facilities
<b>Iowa Utilities Board</b>				
Interstate Power and Light	7/05	Interstate Power and Light and FPL Energy Duane Arnold, LLC	Docket No. SPU-05- 15	Sale of Nuclear Plant
Interstate Power and Light	5/07	City of Everly, Iowa	Docket No. SPU-06-5	Municipalization
Interstate Power and Light	5/07	City of Kalona, Iowa	Docket No. SPU-06-6	Municipalization
Interstate Power and Light	5/07	City of Wellman, Iowa	Docket No. SPU-06- 10	Municipalization
Interstate Power and Light	5/07	City of Terril, Iowa	Docket No. SPU-06-8	Municipalization
Interstate Power and Light	5/07	City of Rolfe, Iowa	Docket No. SPU-06-7	Municipalization



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
<b>Kansas Corporation Commission</b>				
Great Plains Energy Kansas City Power and Light Company	1/17	Great Plains Energy, Kansas City Power & Light Company, and Westar Energy	Docket No. 16-KCPE- 593-ACQ	Merger Standards, Acquisition Premium, Ring-Fencing, Public Interest Standard
Great Plains Energy Kansas City Power and Light Company	8/17 2/18	Great Plains Energy, Kansas City Power & Light Company, and Westar Energy	Docket No. 18-KCPE- 095-MER	Merger Standards, Transaction Value, Merger Benefits, Ring- Fencing,
<b>Maine Public Utility Commission</b>				
Northern Utilities	5/96	Granite State and PNGTS	Docket No. 95-480, 95-481	Transportation Service and PBR
<b>Maryland Public Service Commission</b>				
Eastalco Aluminum	3/82	Potomac Edison	Docket No. 7604	Cost Allocation
Potomac Electric Power Company	8/99	Potomac Electric Power Company	Docket No. 8796	Stranded Cost & Price Protection
AltaGas Ltd./WGL Holdings	4/17 9/17 1/18 2/18	AltaGas Ltd./WGL Holdings	Docket No. 9449	Merger Standards, Public Interest Standard
<b>Mass. Department of Public Utilities</b>				
Haverhill Gas	5/82	Haverhill Gas	Docket No. DPU #1115	Cost of Capital
New England Energy Group	1/87	Commission Investigation		Gas Transportation Rates
Energy Consortium of Mass.	9/87	Commonwealth Gas Company	Docket No. DPU-87- 122	Cost Allocation, Rate Design
Mass. Institute of Technology	12/88	Middleton Municipal Light	DPU #88-91	Cost Allocation, Rate Design
Energy Consortium of Mass.	3/89	Boston Gas	DPU #88-67	Rate Design
PG&E Bechtel Generating Co./ Constellation Holdings	10/91	Commission Investigation	DPU #91-131	Valuation of Environmental Externalities
Coalition of Non-Utility Generators		Cambridge Electric Light Co. & Commonwealth Electric Co.	DPU 91-234 EFSC 91-4	Integrated Resource Management



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
The Berkshire Gas Company Essex County Gas Company Fitchburg Gas and Elec. Light Co.	5/92	The Berkshire Gas Company Essex County Gas Company Fitchburg Gas & Elec. Light Co.	DPU #92-154	Gas Purchase Contract Approval
Boston Edison Company	7/92	Boston Edison	DPU #92-130	Least Cost Planning
Boston Edison Company	7/92	The Williams/Newcorp Generating Co.	DPU #92-146	RFP Evaluation
Boston Edison Company	7/92	West Lynn Cogeneration	DPU #92-142	RFP Evaluation
Boston Edison Company	7/92	L'Energia Corp.	DPU #92-167	RFP Evaluation
Boston Edison Company	7/92	DLS Energy, Inc.	DPU #92-153	RFP Evaluation
Boston Edison Company	7/92	CMS Generation Co.	DPU #92-166	RFP Evaluation
Boston Edison Company	7/92	Concord Energy	DPU #92-144	RFP Evaluation
The Berkshire Gas Company Colonial Gas Company Essex County Gas Company Fitchburg Gas and Electric Company	11/93	The Berkshire Gas Company Colonial Gas Company Essex County Gas Company Fitchburg Gas and Electric Co.	DPU #93-187	Gas Purchase Contract Approval
Bay State Gas Company	10/93	Bay State Gas Company	Docket No. 93-129	Integrated Resource Planning
Boston Edison Company	94	Boston Edison	DPU #94-49	Surplus Capacity
Hudson Light & Power Department	4/95	Hudson Light & Power Dept.	DPU #94-176	Stranded Costs
Essex County Gas Company	5/96	Essex County Gas Company	Docket No. 96-70	Unbundled Rates
Boston Edison Company	8/97	Boston Edison Company	D.P.U. No. 97-63	Holding Company Corporate Structure
Berkshire Gas Company	6/98	Berkshire Gas Mergeco Gas Co.	D.T.E. 98-87	Merger Approval
Eastern Edison Company	8/98	Montaup Electric Company	D.T.E. 98-83	Marketing for Divestiture of its Generation Business
Boston Edison Company	98	Boston Edison Company	D.T.E. 97-113	Fossil Generation Divestiture
Boston Edison Company	2/99	Boston Edison Company	D.T.E. 98-119	Nuclear Generation Divestiture
Eastern Edison Company	12/98	Montaup Electric Company	D.T.E. 99-9	Sale of Nuclear Plant



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
NStar	9/07 12/07	NStar, Bay State Gas, Fitchburg G&E, NE Gas, W. MA Electric	DPU 07-50	Decoupling, Risk
NStar	6/11	NStar, Northeast Utilities	DPU 10-170	Merger Approval
Town of Milford	1/19 3/19 5/19	Milford Water Company	DPU 18-60	Valuation Analysis
<b>Mass. Energy Facilities Siting Council</b>				
Mass. Institute of Technology	1/89	M.M.W.E.C.	EFSC-88-1	Least-Cost Planning
Boston Edison Company	9/90	Boston Edison	EFSC-90-12	Electric Generation Markets
Silver City Energy Ltd. Partnership	11/91	Silver City Energy	D.P.U. 91-100	State Policies, Need for Facility
<b>Michigan Public Service Commission</b>				
Detroit Edison Company	9/98	Detroit Edison Company	Case No. U-11726	Market Value of Generation Assets
Consumers Energy Company	8/06 1/07	Consumers Energy Company	Case No. U-14992	Sale of Nuclear Plant
WE Energies	12/11	Wisconsin Electric Power Co	Case No. U-16830	Economic Benefits, Prudence
Consumer Energy Company	7/13	Consumers Energy Company	Case No. U-17429	Certificate of Need, Integrated Resource Plan
WE Energies	8/14 3/15	WE Energies/Integrys	Case No. U-17682	Merger Application
<b>Minnesota Public Utilities Commission</b>				
Xcel Energy/No. States Power	9/04	Xcel Energy/No. States Power	Docket No. G002/GR-04-1511	NRG Impacts
Interstate Power and Light	8/05	Interstate Power and Light and FPL Energy Duane Arnold, LLC	Docket No. E001/PA-05-1272	Sale of Nuclear Plant
Northern States Power Company d/b/a Xcel Energy	11/05	Northern States Power Company	Docket No. E002/GR-05-1428	NRG Impacts on Debt Costs



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Northern States Power Company d/b/a Xcel Energy	09/06 10/06 11/06	NSP v. Excelsior	Docket No. E6472/M-05-1993	PPA, Financial Impacts
Northern States Power Company d/b/a Xcel Energy	11/06	Northern States Power Company	Docket No. G002/GR-06-1429	Return on Equity
Northern States Power	11/08 05/09	Northern States Power Company	Docket No. E002/GR-08-1065	Return on Equity
Northern States Power	11/09 6/10	Northern States Power Company	Docket No. G002/GR-09-1153	Return on Equity
Northern States Power	11/10 5/11	Northern States Power Company	Docket No. E002/GR-10-971	Return on Equity
Northern States Power Company d/b/a Xcel Energy	1/16	Northern States Power Company	Docket No. E002/GR-15-826	Industry Perspective
<b>Missouri House Committee on Energy and the Environment</b>				
Ameren Missouri	3/16	Ameren Missouri	HB 2816	Performance Based Ratemaking
<b>Missouri Public Service Commission</b>				
Missouri Gas Energy	1/03 04/03	Missouri Gas Energy	Case No. GR-2001-382	Gas Purchasing Practices, Prudence
Aquila Networks	2/04	Aquila-MPS, Aquila L&P	Case Nos. ER-2004-0034 HR-2004-0024	Cost of Capital, Capital Structure
Aquila Networks	2/04	Aquila-MPS, Aquila L&P	Case No. GR-2004-0072	Cost of Capital, Capital Structure
Missouri Gas Energy	11/05 2/06 7/06	Missouri Gas Energy	Case Nos. GR-2002-348 GR-2003-0330	Capacity Planning
Missouri Gas Energy	11/10 1/11	KCP&L	Case No. ER-2010-0355	Natural Gas DSM



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Missouri Gas Energy	11/10 1/11	KCP&L GMO	Case No. ER-2010-0356	Natural Gas DSM
Laclede Gas Company	5/11	Laclede Gas Company	Case No. CG-2011-0098	Affiliate Pricing Standards
Union Electric Company d/b/a Ameren Missouri	2/12 8/12	Union Electric Company	Case No. ER-2012-0166	ROE, Earnings Attrition, Regulatory Lag
Union Electric Company d/b/a Ameren Missouri	6/14	Noranda Aluminum Inc.	Case No. EC-2014-0223	Ratemaking, Regulatory and Economic Policy
Union Electric Company d/b/a Ameren Missouri	1/15 2/15	Union Electric Company	Case No. ER-2014-0258	Revenue Requirements, Ratemaking Policies
Great Plains Energy Kansas City Power and Light Company	8/17 2/18 3/18	Great Plains Energy, Kansas City Power & Light Company, and Westar Energy	Docket No. EM-2018-0012	Merger Standards, Transaction Value, Merger Benefits, Ring-Fencing,
<b>Missouri Senate Committee on Commerce, Consumer Protection, Energy and the Environment</b>				
Ameren Missouri	3/16	Ameren Missouri	SB 1028	Performance Based Ratemaking
<b>Montana Public Service Commission</b>				
Great Falls Gas Company	10/82	Great Falls Gas Company	Docket No. 82-4-25	Gas Rate Adjustment Clause
<b>National Energy Board of Canada</b>				
Alberta-Northeast	2/87	Alberta Northeast Gas Export Project	Docket No. GH-1-87	Gas Export Markets
Alberta-Northeast	11/87	TransCanada Pipeline	Docket No. GH-2-87	Gas Export Markets
Alberta-Northeast	1/90	TransCanada Pipeline	Docket No. GH-5-89	Gas Export Markets
Independent Petroleum Association of Canada	1/92	Interprovincial Pipe Line, Inc.	RH-2-91	Pipeline Valuation, Toll
The Canadian Association of Petroleum Producers	11/93	Transmountain Pipe Line	RH-1-93	Cost of Capital
Alliance Pipeline L.P.	6/97	Alliance Pipeline L.P.	GH-3-97	Market Study
Maritimes & Northeast Pipeline	97	Sable Offshore Energy Project	GH-6-96	Market Study
Maritimes & Northeast Pipeline	2/02	Maritimes & Northeast Pipeline	GH-3-2002	Natural Gas Demand Analysis



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
TransCanada Pipelines	8/04	TransCanada Pipelines	RH-3-2004	Toll Design
Brunswick Pipeline	5/06	Brunswick Pipeline	GH-1-2006	Market Study
TransCanada Pipelines Ltd.	12/06 4/07	TransCanada Pipelines Ltd.: Gros Cacouna Receipt Point Application	RH-1-2007	Toll Design
Repsol Energy Canada Ltd	3/08	Repsol Energy Canada Ltd	GH-1-2008	Market Study
Maritimes & Northeast Pipeline	7/10	Maritimes & Northeast Pipeline	RH-4-2010	Regulatory Policy, Toll Development
TransCanada Pipelines Ltd	9/11 5/12	TransCanada Pipelines Ltd.	RH-3-2011	Business Services and Tolls Application
Trans Mountain Pipeline LLC	6/12 1/13	Trans Mountain Pipeline LLC	RH-1-2012	Toll Design
TransCanada Pipelines Ltd	8/13	TransCanada Pipelines Ltd	RE-001-2013	Toll Design
NOVA Gas Transmission Ltd	11/13	NOVA Gas Transmission Ltd	OF-Fac-Gas-N081-2013-10 01	Toll Design
Trans Mountain Pipeline LLC	12/13	Trans Mountain Pipeline LLC	OF-Fac-Oil-T260-2013-03 01	Economic and Financial Feasibility, Project Benefits
Energy East Pipeline Ltd.	10/14	Energy East Pipeline	OF-Fac-Oil-E266-2014-01 02	Economic and Financial Feasibility, Project Benefits
NOVA Gas Transmission Ltd	5/16	NOVA Gas Transmission Ltd	GH-003-2015	Certificate of Public Convenience and Necessity
TransCanada Pipelines Limited	4/17 9/17	TransCanada Pipelines Limited	Dawn LTFP Service Application	Public Interest, Toll Design
NOVA Gas Transmission Ltd	10/17	NOVA Gas Transmission Ltd	MH-031-2017	Toll Design
NOVA Gas Transmission Ltd	3/19	NOVA Gas Transmission Ltd	System Rate Design and Services Application	Tolling Changes
<b>New Brunswick Energy and Utilities Board</b>				
Atlantic Wallboard/JD Irving Co	1/08	Enbridge Gas New Brunswick	MCTN #298600	Rate Setting for EGNB





SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Atlantic Wallboard/Flakeboard	9/09 6/10 7/10	Enbridge Gas New Brunswick	NBEUB 2009-017	Rate Setting for EGNB
Atlantic Wallboard/Flakeboard	1/14	Enbridge Gas New Brunswick	NBEUB Matter 225	Rate Setting for EGNB
<b>NH Public Utilities Commission</b>				
Bus & Industry Association	6/89	P.S. Co. of New Hampshire	Docket No. DR89-091	Fuel Costs
Bus & Industry Association	5/90	Northeast Utilities	Docket No. DR89-244	Merger & Acquisition Issues
Eastern Utilities Associates	6/90	Eastern Utilities Associates	Docket No. DF89-085	Merger & Acquisition Issues
EnergyNorth Natural Gas	12/90	EnergyNorth Natural Gas	Docket No. DE90-166	Gas Purchasing Practices
EnergyNorth Natural Gas	7/90	EnergyNorth Natural Gas	Docket No. DR90-187	Special Contracts, Discounted Rates
Northern Utilities, Inc.	12/91	Commission Investigation	Docket No. DR91-172	Generic Discounted Rates
Public Service Co. of New Hampshire	7/14	Public Service Co. of NH	Docket No. DE 11-250	Prudence
Public Service Co. of New Hampshire	7/15 11/15	Public Service Co. of NH	Docket No. 14-238	Restructuring and Rate Stabilization
<b>New Jersey Board of Public Utilities</b>				
Hilton/Golden Nugget	12/83	Atlantic Electric	B.P.U. 832-154	Line Extension Policies
Golden Nugget	3/87	Atlantic Electric	B.P.U. No. 837-658	Line Extension Policies
New Jersey Natural Gas	2/89	New Jersey Natural Gas	B.P.U. GR89030335J	Cost Allocation, Rate Design
New Jersey Natural Gas	1/91	New Jersey Natural Gas	B.P.U. GR90080786J	Cost Allocation, Rate Design
New Jersey Natural Gas	8/91	New Jersey Natural Gas	B.P.U. GR91081393J	Rate Design, Weather Normalization Clause
New Jersey Natural Gas	4/93	New Jersey Natural Gas	B.P.U. GR93040114J	Cost Allocation, Rate Design



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
South Jersey Gas	4/94	South Jersey Gas	BRC Dock No. GR080334	Revised Levelized Gas Adjustment
New Jersey Utilities Association	9/96	Commission Investigation	BPU AX96070530	PBOP Cost Recovery
Morris Energy Group	11/09	Public Service Electric & Gas	BPU GR 09050422	Discriminatory Rates
New Jersey American Water Co.	4/10	New Jersey American Water Co.	BPU WR 1040260	Tariff Rates and Revisions
Electric Customer Group	1/11	Generic Stakeholder Proceeding	BPU GR10100761 and ER10100762	Natural Gas Ratemaking Standards and pricing
<b>New Mexico Public Service Commission</b>				
Gas Company of New Mexico	11/83	Public Service Co. of New Mexico	Docket No. 1835	Cost Allocation, Rate Design
Southwestern Public Service Co., New Mexico	12/12	SPS New Mexico	Case No. 12-00350-UT	Rate Case, Return on Equity
PNM Resources	12/13 10/14 12/14	Public Service Co. of New Mexico	Case No. 13-00390-UT	Nuclear Valuation, In Support of Stipulation
<b>New York State Public Service Commission</b>				
Iroquois Gas Transmission	12/86	Iroquois Gas Transmission System	Case No. 70363	Gas Markets
Brooklyn Union Gas Company	8/95	Brooklyn Union Gas Company	Case No. 95-6-0761	Panel on Industry Directions
Central Hudson, ConEdison and Niagara Mohawk	9/00	Central Hudson, ConEdison and Niagara Mohawk	Case No. 96-E-0909 Case No. 96-E-0897 Case No. 94-E-0098 Case No. 94-E-0099	Section 70, Approval of New Facilities
Central Hudson, New York State Electric & Gas, Rochester Gas & Electric	5/01	Joint Petition of NiMo, NYSEG, RG&E, Central Hudson, Constellation and Nine Mile Point	Case No. 01-E-0011	Section 70, Rebuttal Testimony
Rochester Gas & Electric	12/03	Rochester Gas & Electric	Case No. 03-E-1231	Sale of Nuclear Plant
Rochester Gas & Electric	1/04	Rochester Gas & Electric	Case No. 03-E-0765 Case No. 02-E-0198 Case No. 03-E-0766	Sale of Nuclear Plant; Ratemaking Treatment of Sale



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Rochester Gas and Electric and NY State Electric & Gas Corp	2/10	Rochester Gas & Electric NY State Electric & Gas Corp	Case No. 09-E-0715 Case No. 09-E-0716 Case No. 09-E-0717 Case No. 09-E-0718	Depreciation Policy
National Fuel Gas Corporation	9/16 9/16	National Fuel Gas Corporation	Case No. 16-G-0257	Ring-fencing Policy
NextEra Energy Transmission New York	8/18	NextEra Energy Transmission New York	Case No. 18-T-0499	Certificate of Need for Transmission Line, Vertical Market Power
<b>Nova Scotia Utility and Review Board</b>				
Nova Scotia Power	9/12	Nova Scotia Power	Docket No. P-893	Audit Reply
Nova Scotia Power	8/14	Nova Scotia Power	Docket No. P-887	Audit Reply
Nova Scotia Power	5/16	Nova Scotia Power	2017-2019 Fuel Stability Plan	Used and Useful Ratemaking
NSP Maritime Link ("NSPML")	12/16 2/17 5/17	NSP Maritime Link ("NSPML")	NSPML Interim Cost Assessment Application	Used and Useful Ratemaking
<b>Oklahoma Corporation Commission</b>				
Oklahoma Natural Gas Company	6/98	Oklahoma Natural Gas Company	Case PUD No. 980000177	Storage Issues
Oklahoma Gas & Electric Company	5/05 9/05	Oklahoma Gas & Electric Company	Cause No. PUD 200500151	Prudence of McLain Acquisition
Oklahoma Gas & Electric Company	3/08	Oklahoma Gas & Electric Company	Cause No. PUD 200800086	Acquisition of Redbud Generating Facility
Oklahoma Gas & Electric Company	8/14 1/15	Oklahoma Gas & Electric Company	Cause No. PUD 201400229	Integrated Resource Plan
<b>Ontario Energy Board</b>				
Market Hub Partners Canada, L.P.	5/06	Natural Gas Electric Interface Roundtable	File No. EB-2005-0551	Market-based Rates for Storage



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Ontario Power Generation	9/13 2/14 5/14	Ontario Power Generation	EB-2013-0321	Prudence Review of Nuclear Project Management Processes
<b>Oregon Public Utilities Commission</b>				
Hydro One Limited and Avista Corporation	8/18 10/18	Hydro One Limited and Avista Corporation	Docket No. UM 1897	Reasonableness and Sufficiency of the Governance, Bankruptcy, and Financial Ring-Fencing Stipulated Settlement Commitments
<b>Pennsylvania Public Utility Commission</b>				
ATOC	4/95	Equitrans	Docket No. R-00943272	Rate Design, Unbundling
ATOC	3/96 4/96	Equitrans	Docket No. P-00940886	Rate Design, Unbundling
<b>Rhode Island Public Utilities Commission</b>				
Newport Electric	7/81	Newport Electric	Docket No. 1599	Rate Attrition
South County Gas	9/82	South County Gas	Docket No. 1671	Cost of Capital
New England Energy Group	7/86	Providence Gas Company	Docket No. 1844	Cost Allocation, Rate Design
Providence Gas	8/88	Providence Gas Company	Docket No. 1914	Load Forecast, Least-Cost Planning
Providence Gas Company and The Valley Gas Company	1/01 3/02	Providence Gas Company and The Valley Gas Company	Docket No. 1673 and 1736	Gas Cost Mitigation Strategy
The New England Gas Company	3/03	New England Gas Company	Docket No. 3459	Cost of Capital
<b>Texas Public Utility Commission</b>				
Southwestern Electric	5/83	Southwestern Electric		Cost of Capital, CWIP
P.U.C. General Counsel	11/90	Texas Utilities Electric Company	Docket No. 9300	Gas Purchasing Practices, Prudence
Oncor Electric Delivery Company	8/07	Oncor Electric Delivery Company	Docket No. 34040	Regulatory Policy, Rate of Return, Return of Capital and Consolidated Tax Adjustment



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Oncor Electric Delivery Company	6/08	Oncor Electric Delivery Company	Docket No.35717	Regulatory policy
Oncor Electric Delivery Company	10/08 11/08	Oncor, TCC, TNC, ETT, LCRA TSC, Sharyland, STEC, TNMP	Docket No. 35665	Competitive Renewable Energy Zone
CenterPoint Energy	6/10 10/10	CenterPoint Energy/Houston Electric	Docket No. 38339	Regulatory Policy, Risk, Consolidated Taxes
Oncor Electric Delivery Company	1/11	Oncor Electric Delivery Company	Docket No. 38929	Regulatory Policy, Risk
Cross Texas Transmission	8/12 11/12	Cross Texas Transmission	Docket No. 40604	Return on Equity
Southwestern Public Service	11/12	Southwestern Public Service	Docket No. 40824	Return on Equity
Lone Star Transmission	5/14	Lone Star Transmission	Docket No. 42469	Return on Equity, Debt, Cost of Capital
CenterPoint Energy Houston Electric, LLC	6/15	CenterPoint Energy Houston Electric, LLC	Docket No. 44572	Distribution Cost Recovery Factor
NextEra Energy, Inc.	10/16 2/17	Oncor Electric Delivery Company LLC, NextEra Energy	Docket No. 46238	Merger Application, Ring-fencing, Affiliate Interest, Code of Conduct
CenterPoint Energy Houston Electric, LLC	4/19	CenterPoint Energy Houston Electric, LLC	Docket No. 49421	Incentive Compensation
<b>Texas Railroad Commission</b>				
Western Gas Interstate Company	1/85	Southern Union Gas Company	Docket 5238	Cost of Service
Atmos Pipeline Texas	9/10 1/11	Atmos Pipeline Texas	GUD 10000	Ratemaking Policy, Risk
Atmos Pipeline Texas	1/17 4/17	Atmos Pipeline Texas	GUD 10580	Ratemaking Policy, ROE, Rate Design Policy
<b>Texas State Legislature</b>				
CenterPoint Energy	4/13	Association of Electric Companies of Texas	SB 1364	Consolidated Tax Adjustment Clause Legislation



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
<b>Utah Public Service Commission</b>				
AMAX Magnesium	1/88	Mountain Fuel Supply Company	Case No. 86-057-07	Cost Allocation, Rate Design
AMAX Magnesium	4/88	Utah P&L/Pacific P&L	Case No. 87-035-27	Merger & Acquisition
Utah Industrial Group	7/90 8/90	Mountain Fuel Supply	Case No. 89-057-15	Gas Transportation Rates
AMAX Magnesium	9/90	Utah Power & Light	Case No. 89-035-06	Energy Balancing Account
AMAX Magnesium	8/90	Utah Power & Light	Case No. 90-035-06	Electric Service Priorities
Questar Gas Company	12/07	Questar Gas Company	Docket No. 07-057-13	Benchmarking in Support of ROE
<b>Vermont Public Service Board</b>				
Green Mountain Power	8/82	Green Mountain Power	Docket No. 4570	Rate Attrition
Green Mountain Power	12/97	Green Mountain Power	Docket No. 5983	Cost of Service
Green Mountain Power	7/98 9/00	Green Mountain Power	Docket No. 6107	Rate Development
<b>Washington Utilities and Transportation Commission</b>				
Hydro One Limited and Avista Corporation	9/18	Hydro One Limited and Avista Corporation	Docket No. U-170970	Reasonableness and Sufficiency of the Governance, Bankruptcy, and Financial Ring-Fencing Stipulated Settlement Commitments
<b>Wisconsin Public Service Commission</b>				
WEC & WICOR	11/99	WEC	Docket No. 9401-YO-100 Docket No. 9402-YO-101	Approval to Acquire the Stock of WICOR
Wisconsin Electric Power Company	1/07	Wisconsin Electric Power Co.	Docket No. 6630-EI-113	Sale of Nuclear Plant
Wisconsin Electric Power Company	10/09	Wisconsin Electric Power Co.	Docket No. 6630-CE-302	CPCN Application for Wind Project
Northern States Power Wisconsin	10/13	Xcel Energy (dba Northern States Power Wisconsin)	Docket No. 4220-UR-119	Fuel Cost Adjustments



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Wisconsin Electric Power Company	11/13	Wisconsin Electric Power Co.	Docket No. 6630-FR-104	Fuel Cost Adjustment
Wisconsin Gas LLC	5/14	Wisconsin Gas LLC	Docket No. 6650-CG-233	Gas Line Expansion, Reasonableness
WE Energy	8/14 1/15 3/15	WE Energy/Integrus	Docket No. 9400-YO-100	Merger Approval
Wisconsin Public Service Corporation	1/19	Madison Gas and Electric Company and Wisconsin Public Service Corporation	Docket No. 5-BS-228	Evaluation of Models Used in Resource Investment Decisions



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
<b>American Arbitration Association</b>				
Michael Polsky	3/91	M. Polsky vs. Indeck Energy		Corporate Valuation, Damages
ProGas Limited	7/92	ProGas Limited v. Texas Eastern		Gas Contract Arbitration
Attala Generating Company	12/03	Attala Generating Co v. Attala Energy Co.	Case No. 16-Y-198-00228-03	Power Project Valuation, Breach of Contract, Damages
Nevada Power Company	4/08	Nevada Power v. Nevada Cogeneration Assoc. #2		Power Purchase Agreement
Sensata Technologies, Inc./EMS Engineered Materials Solutions, LLC	1/11	Sensata Technologies, Inc./EMS Engineered Materials Solutions, LLC v. Pepco Energy Services	Case No. 11-198-Y-00848-10	Change in Usage Dispute, Damages
Sandy Creek Energy Associates, L.P.	9/17	Sandy Creek Energy Associates, L.P. vs. Lower Colorado River Authority	Case No. 01-16-0002-6892	Power Purchase Agreement, Analysis of Damages
<b>Canadian Arbitration Panel</b>				
Hydro-Québec	4/15 5/16 7/16	Hydro-Fraser et al v. Hydro-Québec		Electric Price Arbitration
<b>Commonwealth of Massachusetts, Appellate Tax Board</b>				
NStar Electric Company	8/14	NStar Electric Company	Docket No. F316346 Docket No. F319254	Valuation Methodology
Western Massachusetts Electric Company	2/16	Western Massachusetts Electric Company v. Board of Assessors of The City of Springfield	Docket No. 315550 Docket No. 319349	Valuation Methodology
<b>Commonwealth of Massachusetts, Suffolk Superior Court</b>				
John Hancock	1/84	Trinity Church v. John Hancock	C.A. No. 4452	Damages Quantification
<b>Court of Common Pleas of Philadelphia County, Civil Division</b>				
Sunoco Marketing & Terminals L.P.	11/16	Sunoco Marketing & Terminals, L.P. v. South Jersey Resources Group	Case No. 150302520	Damages Quantification





SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
<b>State of Colorado District Court, County of Garfield</b>				
Questar Corporation, et al	11/00	Questar Corporation, et al.	Case No. 00CV129-A	Partnership Fiduciary Duties
<b>State of Delaware, Court of Chancery, New Castle County</b>				
Wilmington Trust Company	11/05	Calpine Corporation vs. Bank of New York and Wilmington Trust Company	C.A. No. 1669-N	Bond Indenture Covenants
<b>Illinois Appellate Court, Fifth Division</b>				
Norweb, PLC	8/02	Indeck No. America v. Norweb	Docket No. 97 CH 07291	Breach of Contract, Power Plant Valuation
<b>Independent Arbitration Panel</b>				
Alberta Northeast Gas Limited	2/98	ProGas Ltd., Canadian Forest Oil Ltd., AEC Oil & Gas		
Ocean State Power	9/02	Ocean State Power vs. ProGas Ltd.	2001/2002 Arbitration	Gas Price Arbitration
Ocean State Power	2/03	Ocean State Power vs. ProGas Ltd.	2002/2003 Arbitration	Gas Price Arbitration
Ocean State Power	6/04	Ocean State Power vs. ProGas Ltd.	2003/2004 Arbitration	Gas Price Arbitration
Shell Canada Limited	7/05	Shell Canada Limited and Nova Scotia Power Inc.		Gas Contract Price Arbitration
<b>International Court of Arbitration</b>				
Wisconsin Gas Company, Inc.	2/97	Wisconsin Gas Co. vs. Pan-Alberta	Case No. 9322/CK	Contract Arbitration
Minnegasco, A Division of NorAm Energy Corp.	3/97	Minnegasco vs. Pan-Alberta	Case No. 9357/CK	Contract Arbitration
Utilicorp United Inc.	4/97	Utilicorp vs. Pan-Alberta	Case No. 9373/CK	Contract Arbitration
IES Utilities	97	IES vs. Pan-Alberta	Case No. 9374/CK	Contract Arbitration



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
Mitsubishi Heavy Industries, Ltd., and Mitsubishi Nuclear Energy Systems, Inc.	12/15 2/16	Southern California Edison Company, Edison Material Supply LLC, San Diego Gas & Electric Co., and the City of Riverside vs. Mitsubishi Heavy Industries, Ltd., and Mitsubishi Nuclear Energy Systems, Inc.	Case No. 19784/AGF/RD	Damages Arising Under a Nuclear Power Equipment Contract
<b>International Chamber of Commerce</b>				
Senvion GmbH	4/17	Senvion GmbH v. EDF Renewable Energy, Inc.	Case No. 01-15-0005-4590	Breach-Related Damages, Unfair Competition, Unjust Enrichment
Senvion GmbH	9/17	Senvion GmbH v. EEN CA Lac Alfred Limited Partnership, et al.	Case No. 21535	Breach-Related Damages
Senvion GmbH	12/17	Senvion GmbH v. EEN CA Massif du Sud Limited Partnership, et al.	Case No. 21536	Breach-Related Damages
<b>State of New Jersey, Mercer County Superior Court</b>				
Transamerica Corp., et al.	7/07 10/07	IMO Industries Inc. vs. Transamerica Corp., et al.	Docket No. L-2140-03	Breach-Related Damages, Enterprise Value
<b>State of New York, Nassau County Supreme Court</b>				
Steel Los III, LP	6/08	Steel Los II, LP & Associated Brook, Corp v. Power Authority of State of NY	Index No. 5662/05	Property Seizure
<b>Province of Alberta, Court of Queen's Bench</b>				
Alberta Northeast Gas Limited	5/07	Cargill Gas Marketing Ltd. vs. Alberta Northeast Gas Limited	Action No. 0501-03291	Gas Contracting Practices
<b>Quebec Superior Court, District of Gaspé</b>				
Senvion Canada and Senvion GmbH	2/19	Senvion Canada and Senvion GmbH v. Suspendem Rope Access		Breach-Related Damages, Reimbursement of Liquidated Damages, Reimbursement of Scheduled Maintenance Penalties



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
<b>State of New Hampshire, Judicial Court-Rockingham Superior Court</b>				
Public Service Company of New Hampshire d/b/a Eversource Energy	10/18	Public Service Company of New Hampshire d/b/a Eversource Energy v. City of Portsmouth	Case No. 218-2016-CV-00899 Case No. 218-2017-CV-00917	Valuation of Transmission and Distribution Assets
<b>State of New Hampshire, Superior Court-Merrimack County</b>				
Public Service Company of New Hampshire d/b/a Eversource Energy	3/19	Public Service Company of New Hampshire d/b/a Eversource Energy v. Town of Bow	Docket No. 217-2015-CV-00469, Docket No. 217-2016-CV-00474, Docket No. 217-2017-CV-00422	Valuation of Transmission and Distribution Assets
<b>State of Rhode Island, Providence City Court</b>				
Aquidneck Energy	5/87	Laroche vs. Newport		Least-Cost Planning
<b>State of Texas, Hutchinson County Court</b>				
Western Gas Interstate	5/85	State of Texas vs. Western Gas Interstate Co.	Case No. 14,843	Cost of Service
<b>State of Utah, Third District Court</b>				
PacifiCorp & Holme, Roberts & Owen, LLP	1/07	USA Power & Spring Canyon Energy vs. PacifiCorp, et al.	Civil No. 050903412	Breach-Related Damages
<b>U.S. Bankruptcy Court, District of New Hampshire</b>				
EUA Power Corporation	7/92	EUA Power Corporation	Case No. BK-91-10525-JEY	Pre-Petition Solvency
<b>U.S. Bankruptcy Court, District of New Jersey</b>				
Ponderosa Pine Energy Partners, Ltd.	7/05	Ponderosa Pine Energy Partners, Ltd.	Case No. 05-21444	Forward Contract Bankruptcy Treatment
<b>U.S. Bankruptcy Court, No. District of New York</b>				
Cayuga Energy, NYSEG Solutions, The Energy Network	09/09	Cayuga Energy, NYSEG Solutions, The Energy Network	Case No. 06-60073-6-sdg	Going Concern



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
<b>U.S. Bankruptcy Court, So. District of New York</b>				
Johns Manville	5/04	Enron Energy Mktg. v. Johns Manville; Enron No. America v. Johns Manville	Case No. 01-16034 (AJG)	Breach of Contract, Damages
<b>U.S. Bankruptcy Court, Northern District of Texas</b>				
Southern Maryland Electric Cooperative, Inc., and Potomac Electric Power Company	11/04	Mirant Corporation, et al. v. SMECO	Case No. 03-4659; Adversary No. 04-4073	PPA Interpretation, Leasing
<b>U.S. Court of Federal Claims</b>				
Boston Edison Company	7/06 11/06	Boston Edison Company v. United States	No. 99-447C No. 03-2626C	Spent Nuclear Fuel Breach, Damages
Consolidated Edison Company	7/07	Consolidated Edison Company	No. 06-305T	Evaluation of Lease Purchase Option
Consolidated Edison Company	2/08 6/08	Consolidated Edison Company v. United States	No. 04-0033C	Spent Nuclear Fuel Breach, Damages
Vermont Yankee Nuclear Power Corporation	6/08	Vermont Yankee Nuclear Power Corporation v. United States	No. 03-2663C	Spent Nuclear Fuel Breach, Damages
Virginia Electric and Power Company d/b/a Dominion Virginia Power	3/19	Virginia Electric and Power Company d/b/a Dominion Virginia Power v. United States	No. 17-464C	Double Recovery, Cost Recovery of Infrastructure Improvements
<b>U. S. District Court, Boulder County, Colorado</b>				
KN Energy, Inc.	3/93	KN Energy vs. Colorado GasMark, Inc.	Case No. 92 CV 1474	Gas Contract Interpretation
<b>U. S. District Court, Northern California</b>				
Pacific Gas & Electric Co./PGT PG&E/PGT Pipeline Exp. Project	4/97	Norcen Energy Resources Limited	Case No. C94-0911 VRW	Fraud Claim
<b>U. S. District Court, District of Connecticut</b>				
Constellation Power Source, Inc.	12/04	Constellation Power Source, Inc. v. Select Energy, Inc.	Civil Action 304 CV 983 (RNC)	ISO Structure, Breach of Contract



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
<b>U.S. District Court, Northern District of Illinois, Eastern Division</b>				
U.S. Securities and Exchange Commission	4/12	U.S. Securities and Exchange Commission v. Thomas Fisher, Kathleen Halloran, and George Behrens	Case No. 07 C 4483	Prudence, PBR
<b>U. S. District Court, Massachusetts</b>				
Eastern Utilities Associates & Donald F. Pardus	3/94	NECO Enterprises Inc. vs. Eastern Utilities Associates	Civil Action No. 92-10355-RCL	Seabrook Power Sales
<b>U. S. District Court, Montana</b>				
KN Energy, Inc.	9/92	KN Energy v. Freeport MacMoRan	Docket No. CV 91-40-BLG-RWA	Gas Contract Settlement
<b>U.S. District Court, New Hampshire</b>				
Portland Natural Gas Transmission and Maritimes & Northeast Pipeline	9/03	Public Service Company of New Hampshire vs. PNGTS and M&NE Pipeline	Docket No. C-02-105-B	Impairment of Electric Transmission Right-of-Way
<b>U. S. District Court, Southern District of New York</b>				
Central Hudson Gas & Electric	11/99 8/00	Central Hudson v. Riverkeeper, Inc., Robert H. Boyle, John J. Cronin	Civil Action 99 Civ 2536 (BDP)	Electric Restructuring, Environmental Impacts
Consolidated Edison	3/02	Consolidated Edison v. Northeast Utilities	Case No. 01 Civ. 1893 (JGK) (HP)	Industry Standards for Due Diligence
Merrill Lynch & Company	1/05	Merrill Lynch v. Allegheny Energy, Inc.	Civil Action 02 CV 7689 (HB)	Due Diligence, Breach of Contract, Damages
<b>U. S. District Court, Eastern District of Virginia</b>				
Aquila, Inc.	1/05 2/05	VPEN v. Aquila, Inc.	Civil Action 304 CV 411	Breach of Contract, Damages
<b>U. S. District Court, Western District of Virginia</b>				
Washington Gas Light Company	8/15 9/15	Washington Gas Light Company v. Mountaineer Gas Company	Civil Action No. 5:14-cv-41	Nominations and Gas Balancing, Lost and Unaccounted for Gas, Damages



SPONSOR	DATE	CASE/APPLICANT	DOCKET NO.	SUBJECT
<b>U. S. District Court, Portland Maine</b>				
ACEC Maine, Inc. et al.	10/91	CIT Financial vs. ACEC Maine	Docket No. 90-0304-B	Project Valuation
Combustion Engineering	1/92	Combustion Eng. vs. Miller Hydro	Docket No. 89-0168P	Output Modeling, Project Valuation
<b>U.S. Securities and Exchange Commission</b>				
Eastern Utilities Association	10/92	EUA Power Corporation	File No. 70-8034	Value of EUA Power
<b>U.S. Tax Court in Illinois</b>				
Exelon Corporation	4/15 6/15	Exelon Corporation, as Successor by Merger to Unicom Corporation and Subsidiaries et al. v. Commission of Internal Revenue	Docket Nos. 29183-13, 29184-13	Valuation of Analysis of Lease Terms and Quantify Plant Values
<b>Council of the District of Columbia Committee on Consumer and Regulatory Affairs</b>				
Potomac Electric Power Co.	7/99	Potomac Electric Power Co.	Bill 13-284	Utility Restructuring

Line No.	Service Company	Operating Companies	Services Provided by Affiliated Services Company
1	AES US Services, LLC	<ol style="list-style-type: none"> <li>1. Indianapolis Power &amp; Light Company</li> <li>2. IPALCO Enterprises, Inc.</li> <li>3. AES Corporation (on behalf of US Generation Plants)</li> <li>4. The Dayton Power and Light</li> <li>5. AES Ohio Generation, LLC</li> <li>6. DPL Inc</li> <li>7. Miami Valley Lighting, LLC</li> <li>8. Miami Valley Insurance Company</li> <li>9. MacGregor Park, Inc.</li> <li>10. AES Alamitos, LLC</li> <li>11. AES Redondo Beach, LLC</li> <li>12. AES Hawaii, Inc.</li> <li>13. AES WR Limited Partnership</li> <li>14. AES Shady Point, LLC</li> <li>15. AES Wind Generation, LLC</li> <li>16. AES ES Tait, LLC</li> <li>17. THE AES Corporation</li> <li>18. AES Business Development</li> <li>19. AES Huntington Beach Energy, LLC</li> <li>20. AES Es Alamitos, LLC</li> <li>21. AES Alamitos Energy LLC</li> <li>22. AES Distributed Energy, Inc.</li> </ol>	<ul style="list-style-type: none"> <li>• Executive Staff</li> <li>• Contoller</li> <li>• Technical Accounting</li> <li>• Financial Reporting</li> <li>• Regulatory Accounting</li> <li>• Fixed Assets</li> <li>• Accounts Payable</li> <li>• Payroll</li> <li>• Operational Accounting</li> <li>• General Accounting</li> <li>• Revenue Accounting</li> <li>• Treasury</li> <li>• Plant Managers</li> <li>• Financial Planning</li> <li>• Tax</li> <li>• Risk Management</li> <li>• Settlements</li> <li>• Legal Services</li> <li>• Environmental Policy</li> <li>• Human Resources Operations &amp; Talent Acquisition</li> <li>• Human Resources - Total Rewards</li> <li>• Human Resources - Talent Development</li> <li>• Network</li> <li>• Communications</li> <li>• Customer Service</li> <li>• T &amp; D Metering Services &amp; Safety</li> <li>• T&amp;D Reliability Programs</li> <li>• T&amp;D Engineering</li> <li>• T&amp;D Systems Operating</li> <li>• Infrastructure Security</li> <li>• Safety</li> <li>• Governance &amp; Audit Programs</li> <li>• Internal Audit</li> <li>• Supply Chain</li> <li>• Logistics &amp; Material Mgmt. - T&amp;D</li> <li>• Business Intelligence &amp; Analytics</li> <li>• Strategic Sourcing</li> </ul>

			<ul style="list-style-type: none"> <li>• Logistics &amp; Material Mgmt. - Generation</li> <li>• IT Management</li> <li>• IT Infrastructure</li> <li>• IT Competitive Generation Applications</li> <li>• IT Enterprise Applications</li> <li>• IT Collaboration Services</li> <li>• IT Strategy, Security &amp; Governance</li> <li>• IT T&amp;D Applications</li> <li>• Human Resources Employee Relations</li> <li>• Merchant Portfolio Strategy</li> <li>• Market Operations - Systems and Analysis</li> <li>• A&amp;PM Leadership/APEX</li> <li>• A&amp;PM NERC</li> <li>• A&amp;PM Performance</li> <li>• A&amp;PM Technical Services</li> <li>• Generation Central Services - Workforce Development</li> <li>• A&amp;PM Planning</li> <li>• Central Hedging &amp; Market Analysis</li> <li>• A&amp;PM Asset Management</li> <li>• T&amp;D Asset Strategy</li> <li>• Public Affairs</li> <li>• A&amp;PM Engineering</li> </ul>
2	Algonquin Power & Utilities Corp	<ol style="list-style-type: none"> <li>1. Algonquin Power Trust</li> <li>2. Liberty Utilities (Sub) Corp.</li> <li>3. Liberty Utilities (CalPeco) LLC</li> <li>4. Liberty Utilities (Granite State Electric) Corp.</li> <li>5. Liberty Utilities (Energy North Natural Gas) Corp.</li> <li>6. Liberty Utilities (Midstates Natural Gas) Corp.</li> <li>7. Liberty Utilities (Canada) Corp.</li> <li>8. Liberty Utilities (Peach State Natural Gas) Corp.</li> </ol>	<ul style="list-style-type: none"> <li>• Legal Costs</li> <li>• Tax Services</li> <li>• Audit</li> <li>• Investor Relations</li> <li>• Director Fees and Insurance</li> <li>• Licenses, Fees and Permits</li> <li>• Escrow and Transfer Agent Fees</li> <li>• Other Professional Services</li> <li>• Executive and Strategic Management</li> <li>• Other Administration Costs</li> </ul>



		<ol style="list-style-type: none"> <li>9. Liberty Utilities (Pine Bluff Water) Corp.</li> <li>10. Liberty Energy Utilities (New Hampshire) Corp.</li> <li>11. Liberty Utilities (New England Natural Gas) Corp.</li> <li>12. Liberty Utilities (White Hall Water) Corp.</li> <li>13. Liberty Utilities (White Hall Sewer) Corp.</li> <li>14. Liberty Utilities Co.</li> <li>15. Liberty Utilities (Park Water) Corp.</li> <li>16. Empire,</li> <li>17. Liberty Utilities (Woodson-Hensley Water) Corp.</li> </ol>	
3	Allegheny Energy Service Corporation	<ol style="list-style-type: none"> <li>1. FirstEnergy Service Company</li> </ol>	<ul style="list-style-type: none"> <li>• All charges recorded at Allegheny Service Corporation are allocated 100% to FirstEnergy Service Company monthly</li> </ul>
4	Alliant Energy Corporate Services, Inc	<ol style="list-style-type: none"> <li>1. Alliant Energy Corporation</li> <li>2. Alliant Energy SPE LLC</li> <li>3. Wisconsin Power and Light Company</li> <li>4. Interstate Power and Light Company</li> <li>5. Alliant Energy Resources, LLC</li> <li>6. Heartland Energy Group, Inc.</li> <li>7. AE Field Services, LLC</li> <li>8. Industrial Energy Applications Delaware, Inc.</li> <li>9. Alliant Energy Transportation, Inc.</li> <li>10. Cedar Rapids and Iowa City Railway Company</li> <li>11. El Barge Services, Inc.</li> <li>12. Williams Bulk Transfer, Inc.</li> <li>13. Alliant Energy Investments, Inc.</li> </ol>	<ul style="list-style-type: none"> <li>• Accounting</li> <li>• Administrative</li> <li>• Corporate</li> <li>• Corporate Secretary</li> <li>• Customer Service</li> <li>• Customer Assistance and Customer Relations</li> <li>• Electric System Maintenance</li> <li>• Electric Distribution Engineering and Construction</li> <li>• Environmental Affairs</li> <li>• Facilities</li> <li>• Finance</li> <li>• Fuels</li> <li>• Gas Acquisition and Dispatch</li> <li>• Gas System Maintenance</li> <li>• Gas Transmission and Distribution Engineering and Construction</li> <li>• Human Resources</li> <li>• Information Systems</li> <li>• Insurance and Risk Management</li> </ul>

		<ol style="list-style-type: none"> <li>14. Iowa Land and Building Company</li> <li>15. Alliant Energy International, Inc.</li> <li>16. Alliant Energy Generation, Inc.</li> <li>17. Sheboygan Power, LLC</li> <li>18. Franklin County Holdings, LLC</li> <li>19. Franklin County Wind, LLC</li> <li>20. Alliant Energy Finance, LLC</li> <li>21. Iowa Growth and Development, LLC</li> <li>22. Comprehensive Energy Solutions, LLC</li> <li>23. AE Development Holdco, LLC</li> <li>24. AER Biofuels, LLC</li> </ol>	<ul style="list-style-type: none"> <li>• Internal Auditing</li> <li>• Investor Relations</li> <li>• Legal</li> <li>• Materials Management</li> <li>• Meters</li> <li>• Power Engineering and Construction Planning</li> <li>• Power Planning</li> <li>• Public and Community Affairs</li> <li>• Rates</li> <li>• Real Estate and Right of Way</li> <li>• Shareowner Services</li> <li>• Transportation</li> </ul>
5	Ameren Services Company	<ol style="list-style-type: none"> <li>1. Ameren Corporation</li> <li>2. Ameren Development Company</li> <li>3. Ameren Energy Medina Valley Cogen, LLC</li> <li>4. Ameren Illinois Company</li> <li>5. Ameren Transmission Company of Illinois</li> <li>6. Union Electric Company</li> <li>7. ATX East, LLC</li> <li>8. ATX Southwest, LLC</li> </ol>	<ul style="list-style-type: none"> <li>• Human Resources</li> <li>• Corporate Communications</li> <li>• General Counsel</li> <li>• Corporate Operations, Continuous Improvement, Data Analytics</li> <li>• Strategy, Innovation, Economic Development</li> <li>• Treasurers</li> <li>• Controllers</li> <li>• Tax</li> <li>• Internal Audit</li> <li>• Supply Services</li> <li>• Ameren Services Center</li> <li>• Information Technology</li> <li>• Environmental Services</li> <li>• Financial Services</li> <li>• Transmission Services</li> <li>• Energy Delivery Technical Services</li> </ul>
6	American Electric Power Service Corporation	<ol style="list-style-type: none"> <li>1. AEP Amazon</li> <li>2. AEP Appalachian Transmission Company, Inc.</li> <li>3. AEP C&amp;I Company LLC</li> <li>4. AEP Coal, Inc.</li> <li>5. AEP Credit, Inc.</li> <li>6. AEP Desert Sky GP, LLC</li> </ol>	<ul style="list-style-type: none"> <li>• Corporate Human Resources</li> <li>• Information Technology</li> <li>• Real Estate and Workplace Services</li> <li>• Chief Administrative Officer Administration</li> <li>• Audit Services</li> <li>• Legal</li> </ul>

		<ol style="list-style-type: none"> <li>7. AEP Desert Sky LP II, LLC</li> <li>8. AEP Energy Partners, Inc.</li> <li>9. AEP Energy Service Gas Holding Company</li> <li>10. AEP Energy Services, Inc.</li> <li>11. AEP Energy Supply LLC</li> <li>12. AEP Energy, Inc</li> <li>13. AEP Generating Company</li> <li>14. AEP Generation Resources</li> <li>15. AEP Indiana Michigan Transmission Company, Inc.</li> <li>16. AEP Investments, Inc.</li> <li>17. AEP Kentucky Coal, LLC</li> <li>18. AEP Kentucky Transmission Company, Inc.</li> <li>19. AEP Nonutility Funding LLC</li> <li>20. AEP Ohio Transmission Company, Inc.</li> <li>21. AEP Oklahoma Transmission Company, Inc.</li> <li>22. AEP OnSite Partners, LLC</li> <li>23. AEP Pro Serv, Inc.</li> <li>24. AEP Properties, LLC</li> <li>25. AEP Renewables, LLC</li> <li>26. AEP Retail Energy Partners LLC</li> <li>27. AEP Southwestern Transmission Company, Inc.</li> <li>28. AEP System Pool</li> <li>29. AEP T&amp;D Services, LLC</li> <li>30. AEP Texas Company</li> <li>31. AEP Transmission Company, LLC</li> <li>32. AEP Transmission Holding Company, LLC</li> </ol>	<ul style="list-style-type: none"> <li>• Chief Executive Officer Administration</li> <li>• Corporate Accounting</li> <li>• Corporate Planning &amp; Budgeting</li> <li>• Investor Relations</li> <li>• Risk and Strategic Initiatives</li> <li>• Supply Chain &amp; Fleet Operations</li> <li>• Treasury</li> <li>• Chief Financial Officer Administration</li> <li>• Aviation</li> <li>• Cyber Risk &amp; Security Services</li> <li>• Physical Security</li> <li>• Chief Security Officer Administration</li> <li>• Commercial Operations</li> <li>• Energy Supply Administration</li> <li>• Chief Customer Officer</li> <li>• Corporate Communications</li> <li>• Federal Affairs</li> <li>• Regulatory Services</li> <li>• External Affairs Administration</li> <li>• Environmental Services</li> <li>• Fossil and Hydro Generation</li> <li>• Generation Business Services</li> <li>• Generation Engineering and Technical Services - Engineering Services</li> <li>• Generation Engineering and Technical Services - Project and Construction</li> <li>• Regulated Commercial Operations</li> <li>• Generation Administration</li> <li>• Corporate Safety &amp; Health</li> <li>• Transmission Asset Strategy &amp; Policy</li> <li>• Transmission Business Operations Programs</li> <li>• Transmission Controls and Field Services</li> <li>• Transmission Grid Development</li> <li>• Transmission Administration</li> <li>• Utility Operations</li> </ul>
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		<p>33. AEP Transmission Partner LLC</p> <p>34. AEP Utility Funding LLC</p> <p>35. AEP West Virginia Transmission Company, Inc.</p> <p>36. AEP Wind GP, LLC</p> <p>37. AEP Wind Holding Company, LLC</p> <p>38. AEP Wind LP II, LLC</p> <p>39. American Electric Power Company</p> <p>40. Appalachian Power Company</p> <p>41. Blackhawk Coal Company</p> <p>42. Bold Transmission, LLC</p> <p>43. BSE Solutions LLC</p> <p>44. Cardinal Operating Company</p> <p>45. Cedar Coal Company</p> <p>46. Central Appalachian Coal Company</p> <p>47. Central Coal Company</p> <p>48. Conesville Coal Preparation Company</p> <p>49. CSW Energy, Inc.</p> <p>50. Desert Sky Wind Farm LP</p> <p>51. Dolet Hills Lignite Co, LLC,</p> <p>52. Electric Transmission America</p> <p>53. Electric Transmission TX, LLC</p> <p>54. Franklin Real Estate Company</p> <p>55. Grid Assurance LLC</p> <p>56. Indiana Michigan Power Company</p> <p>57. Kentucky Power Company</p> <p>58. Kingsport Power Company</p> <p>59. Ohio Franklin Realty, LLC</p> <p>60. Ohio Power Company</p> <p>61. Oxbow Lignite Company, LLC</p>	
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		62. Public Liability 63. Public Service Company of Oklahoma 64. RITELine Indiana, LLC 65. Snowcap Coal Company, Inc. 66. Solar LLCs 67. Southern Appalachian Coal Company 68. Southwestern Electric Power Company 69. Transource Energy, LLC 70. Transource Maryland 71. Transource Missouri, LLC 72. Transource Pennsylvania 73. Transource West Virginia, LLC 74. Trent Wind Farm LP 75. United Sciences Testing, Inc. 76. Wheeling Power Company	
7	ATC Management Inc	1. American Transmission Company LLC 2. ATC Development Manager Inc	<ul style="list-style-type: none"> <li>• Asset Management</li> <li>• Business Administration Services</li> <li>• Compliance &amp; Risk Management</li> <li>• Corporate</li> <li>• Corporate Communications</li> <li>• Facilities</li> <li>• Finance &amp; Accounting</li> <li>• Human Resources</li> <li>• Information Technology</li> <li>• Legal</li> <li>• Officers</li> <li>• Business Development</li> <li>• Construction</li> <li>• Corporate Security</li> <li>• Customer Relations</li> <li>• Environmental &amp; Local Relations</li> <li>• Governmental Relations</li> <li>• Public Affairs</li> <li>• Real Estate</li> <li>• Regulatory Relations &amp; Policy</li> <li>• System Operations</li> </ul>

8	Avangrid Service Company	<ol style="list-style-type: none"> <li>1. Scottish Power UK PLC</li> <li>2. AVANGRID Networks, Inc.</li> <li>3. New York State Electric &amp; Gas Corporation</li> <li>4. Rochester Gas and Electric Corporation</li> <li>5. Central Maine Power Company</li> <li>6. CMP Group, Inc.</li> <li>7. The Union Water Power Company</li> <li>8. Maine Electric Power Company, Inc.</li> <li>9. Chester SVC Partnership</li> <li>10. Maine Natural Gas Corporation</li> <li>11. AVANGRID Networks NY Transco</li> <li>12. UIL Holdings Corporation</li> </ol>	<ul style="list-style-type: none"> <li>• System Planning</li> <li>• Innovation</li> <li>• Environment &amp; Quality</li> <li>• Real Estate and General Services</li> <li>• Corporate Security</li> <li>• IT</li> <li>• Human Resources</li> <li>• Purchasing</li> <li>• Insurance</li> <li>• Finance and Treasury</li> <li>• Risks</li> <li>• Control</li> <li>• Administration</li> <li>• Tax</li> <li>• Communications</li> <li>• Legal Services</li> <li>• Corporate Development</li> <li>• DG Business and Regulation</li> <li>• External Audit</li> <li>• Secretary of the Board</li> <li>• Internal Audit</li> <li>• Compliance</li> </ul>
9	Black Hills Service Company, LLC	<ol style="list-style-type: none"> <li>1. Wyodak Resources Dev Corp</li> <li>2. Black Hills Wyoming LLC</li> <li>3. Black Hills Electric Generation LLC</li> <li>4. Black Hills Non-Regulated Holdings LLC</li> <li>5. Black Hills Colorado IPP, LLC</li> <li>6. Generation Development Co LLC</li> <li>7. N780BH LLC</li> <li>8. Black Hills Exploration &amp; Production LLC</li> <li>9. Black Hills Power Inc</li> <li>10. Cheyenne Light Fuel and Power</li> <li>11. Black Hills Utility Holdings Inc</li> <li>12. Black Hills Kansas Gas Utility Co LLC</li> <li>13. Black Hills Iowa Gas Utility Co LLC</li> </ol>	<ul style="list-style-type: none"> <li>• Environmental Services</li> <li>• Property Accounting</li> <li>• Accounting Systems</li> <li>• Accounts Payable</li> <li>• Tax</li> <li>• Credit and Risk</li> <li>• General Accounting</li> <li>• Insurance</li> <li>• Internal Audit</li> <li>• Legal</li> <li>• Corporate Affairs</li> <li>• Budget and Forecast</li> <li>• Accounting-Central Services</li> <li>• Engineering Rotation Program</li> <li>• Internal Audit</li> <li>• In-House Creative Solutions</li> <li>• Records Management</li> <li>• Supply Chain Management</li> <li>• Contract Management</li> <li>• Strategic Sourcing</li> <li>• Fleet Services</li> <li>• Facilities</li> <li>• Governmental Affairs</li> <li>• IT Administration</li> </ul>

		<p>14. Black Hills Nebraska Gas Utility Co LLC</p> <p>15. Black Hills Colorado Electric Utility Co LP</p> <p>16. Black Hills Colorado Gas Utility Co LP</p> <p>17. Black Hills Northwest Wyoming Gas Utility Co</p> <p>18. Black Hills Shoshone Pipeline LLC</p> <p>19. Black Hills Energy Arkansas, Inc</p> <p>20. Black Hills Gas Distribution Colorado</p> <p>21. Black Hills Gas Distribution Nebraska</p> <p>22. Black Hills Gas Distribution Wyoming</p> <p>23. Rocky Mountain Natural Gas LLC</p> <p>24. Black Hills Energy Services Company</p> <p>25. Black Hills Corporation</p>	<ul style="list-style-type: none"> <li>• IT Business Applications Wholesale &amp; Enterprise</li> <li>• IT Business Applications Web Service Support</li> <li>• IT Business Applications Financial &amp; HR Systems</li> <li>• IT Infrastructure Services</li> <li>• IT Communications</li> <li>• IT User Services Corporate Security</li> <li>• IT Compliance</li> <li>• Material Management</li> <li>• Continuous Improvement</li> <li>• IT Helpdesk/Technology Integration</li> <li>• Procurement</li> <li>• Corporate Development</li> <li>• Corporate Governance</li> <li>• Shareholder Services</li> <li>• Executive Management</li> <li>• Finance &amp; Treasury</li> <li>• Financial Reporting</li> <li>• Safety</li> <li>• Human Resources Regulated</li> <li>• Compensation &amp; Benefits</li> <li>• Organizational Development &amp; Training</li> <li>• Power Delivery Management</li> <li>• Accounting-Generations Services</li> <li>• IT Business Applications Regulated</li> <li>• Assets Blended</li> <li>• Accounting Accruals</li> <li>• Benefits</li> <li>• BHSC portion of the Rapid city Plant Street</li> <li>• Facility</li> <li>• Midlands Data Facility and Bellevue</li> <li>• Data Center Facility</li> <li>• Corporate Development</li> <li>• Corporate Governance</li> <li>• Shareholder Services</li> <li>• Executive Management</li> <li>• Finance &amp; Treasury</li> <li>• Financial Reporting</li> <li>• Safety</li> </ul>
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			<ul style="list-style-type: none"> <li>• Human Resources Regulated</li> <li>• Compensation &amp; Benefits</li> <li>• Organizational Development &amp; Training</li> <li>• Power Delivery Management</li> <li>• Accounting-Generations Services</li> <li>• IT Business Applications Regulated</li> <li>• Generation Plant Operations</li> <li>• CPGS Plant Operations</li> <li>• Rapid City Plant Street Facility</li> <li>• Baken Park Facility</li> <li>• Denver Office Facility</li> </ul>
10	Black Hills Utility Holdings, Inc	<ol style="list-style-type: none"> <li>1. Black Hills Power Inc</li> <li>2. Cheyenne Light Fuel and Power</li> <li>3. Black Hills Kansas Gas Utility Company LLC</li> <li>4. Black Hills Iowa Gas Utility Company LLC</li> <li>5. Black Hills Nebraska Gas Utility Company LLC</li> <li>6. Black Hills Colorado Electric Utility Company LP</li> <li>7. Black Hills Colorado Gas Utility Company LP</li> <li>8. Black Hills Northwest Wyoming</li> <li>9. Black Hills Shoshone Pipeline</li> <li>10. Black Hills Energy Arkansas</li> <li>11. Black Hills Gas Distribution Colorado</li> <li>12. Black Hills Gas Distribution Nebraska</li> <li>13. Black Hills Gas Distribution Wyoming</li> <li>14. Rocky Mountain Natural Gas</li> <li>15. Black Hills Energy Service Company</li> <li>16. Black Hills Gas Holdings LLC</li> <li>17. Black Hills Utility Money Pool Company</li> </ol>	<ul style="list-style-type: none"> <li>• BHUH Benefits Loading</li> <li>• BHUH Accounting Accruals</li> <li>• All Blended Assets</li> <li>• Electric Blended Assets</li> <li>• Gas Blended Assets</li> <li>• Electric Engineering Services</li> <li>• Regulatory Services Utility</li> <li>• Operations Management</li> <li>• Business Development</li> <li>• Power Supply and Renewables</li> <li>• Electric Ops Communications</li> <li>• Gas Engineering Management</li> <li>• Gas Supply Services Administration</li> <li>• Computer Aided Dispatch</li> <li>• FAME Assets</li> <li>• Work Management Assets</li> <li>• Regulated Generation Assets</li> <li>• Customer Blended Assets</li> <li>• Gas</li> <li>• Engineering Services</li> <li>• GIS Support</li> <li>• General Meter Shop</li> <li>• Customer Serv Call Centers</li> <li>• Customer Serv Supp / LV</li> <li>• Billing</li> <li>• Customer Serv Billing/Collections</li> <li>• Customer Serv Field Resource Center</li> <li>• Repair Business Marketing</li> <li>• Regulatory Affairs</li> <li>• Energy Efficiency/DSM</li> <li>• Transmission Planning</li> </ul>



			<ul style="list-style-type: none"> <li>• T&amp;D Engineering</li> <li>• NERC Compliance</li> <li>• FERC Tariff and Compliance</li> <li>• Transmission and Distribution Reliability</li> <li>• NERC Transmission and Tech Support</li> <li>• Transmission Service Management</li> <li>• Substation/Protection Eng</li> <li>• Engineering Resources</li> <li>• Elec Maint Services</li> <li>• Vegetation Management</li> </ul>
11	CenterPoint Energy Service Company, LLC	<ol style="list-style-type: none"> <li>1. CenterPoint Energy Houston Electric, LLC</li> <li>2. CenterPoint Energy Resources Corp.</li> <li>3. CenterPoint MRT Services Company</li> <li>4. Enable Midstream Partners, LP</li> <li>5. National Furnace Company</li> <li>6. Arkansas Louisiana Finance Corp</li> <li>7. CenterPoint Energy Funding Company</li> <li>8. CenterPoint Energy Properties, Inc</li> <li>9. CenterPoint Energy Arkla</li> <li>10. CenterPoint Energy Minnesota Gas</li> <li>11. Minnesota Intrastate Pipeline Company</li> <li>12. CenterPoint Energy Services, Inc.</li> <li>13. CenterPoint Energy Intrastate Pipelines, LLC</li> <li>14. CenterPoint Energy Entex</li> <li>15. CenterPoint Energy Mobile Energy Solutions, Inc.</li> <li>16. Allied Materials Corporation</li> <li>17. CenterPoint Energy Investment Management, Inc.</li> </ol>	<ul style="list-style-type: none"> <li>• Administrative and service functions involving system-wide coordination</li> <li>• Strategy and compliance functions</li> </ul>

		18. CenterPoint Energy, Inc. 19. Utility Holding, LLC 20. CenterPoint Energy Southeastern Pipelines Holding, LLC 21. Labo Land Holdings, LLC 22. CenterPoint Energy Intelligent Energy Solutions, LLC	
12	Columbia Pipeline Group Service Company	1. Columbia Gas Transmission LLC 2. Columbia Gulf Transmission Co 3. Columbia Midstream Group, LLC 4. Columbia Pipeline Group Inc 5. Columbia Energy Ventures LLC 6. Crossroads Pipeline Company 7. Columbia Pipeline Partners LP 8. CNS Microwave Inc 9. Columbia Energy Group 10. Columbia Remainder Corp	<ul style="list-style-type: none"> <li>• Auditing</li> <li>• Business Unit Services</li> <li>• Corporate Affairs</li> <li>• Finance and Accounting</li> <li>• Human Resources and Employee Engagement</li> <li>• Information Technology</li> <li>• Legal Services</li> <li>• Office of CEO and President</li> </ul>
13	Dominion Resources Services, Inc	1. CNG Coal Company 2. CNG Power Services Corporation 3. Dominion Cove Point, Inc. 4. Dominion ACP Holding, Inc. 5. Dominion Capital, Inc. 6. Dominion Energy Carolina Gas Services, Inc. 7. Dominion Energy Carolina Gas Transmission, LLC 8. Dominion Energy Cove Point LNG, LP 9. Dominion Energy Fairless, LLC 10. Dominion Energy Field Services, Inc.	<ul style="list-style-type: none"> <li>• Accounting Services</li> <li>• Audit</li> <li>• Business Planning</li> <li>• Corporate Secretary</li> <li>• Energy Marketing</li> <li>• Environment</li> <li>• Executive</li> <li>• External Affairs</li> <li>• General Services</li> <li>• Legal</li> <li>• Operations</li> <li>• Travel Services</li> <li>• Aviation</li> <li>• Accounting</li> <li>• Information Technology</li> <li>• Electronic Transmission and Computer Services and Software Pooling</li> <li>• Human Resources</li> </ul>

		<ol style="list-style-type: none"> <li>11. Dominion Energy Fuel Services, Inc.</li> <li>12. Dominion Energy Gas Holdings, LLC</li> <li>13. Dominion Energy Generation Marketing, Inc.</li> <li>14. Dominion Energy Kewaunee, Inc.</li> <li>15. Dominion Energy Manchester Street, Inc.</li> <li>16. Dominion Energy Midstream GP, LLC</li> <li>17. Dominion Energy Nuclear Connecticut, Inc.</li> <li>18. Dominion Energy Overthrust Pipeline, LLC</li> <li>19. Dominion Energy Payroll Company, Inc</li> <li>20. Dominion Energy Privatization Texas, LLC</li> <li>21. Dominion Energy Questar Corporation</li> <li>22. Dominion Energy Questar Pipeline, LLC</li> <li>23. Dominion Energy Solar CA, LLC</li> <li>24. Dominion Energy Solutions, Inc.</li> <li>25. Dominion Energy Technical Solutions, Inc.</li> <li>26. Dominion Energy Terminal Company, Inc.</li> <li>27. Dominion Energy Transmission, Inc.</li> <li>28. Dominion Energy, Inc.</li> <li>29. Dominion Generation, Inc.</li> <li>30. Dominion Greenbrier Pipeline Co, LLC</li> <li>31. Dominion Greenbrier, Inc.</li> <li>32. Dominion Iroquois, Inc.</li> <li>33. Dominion Lands, Inc.</li> <li>34. Dominion Natrium Holdings, Inc.</li> </ol>	<ul style="list-style-type: none"> <li>• Business Services</li> <li>• Corporate Planning</li> <li>• Supply Chain</li> <li>• Tax</li> <li>• Customer Services</li> <li>• Treasury/ Finance</li> </ul>
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		35. Dominion Products and Services, Inc. 36. Dominion Solar Holdings II, LLC 37. Dominion Solar Projects D, Inc. 38. Dominion Solar Projects IV, Inc. 39. Dominion Solar Services, Inc. 40. Dominion Voltage, Inc. 41. Hope Gas, Inc. 42. Questar Field Services, LLC 43. Questar Gas Company 44. Questar Southern Trails Pipeline Company 45. The East Ohio Gas Company 46. Tioga Properties, LLC 47. Virginia Electric and Power Company 48. Virginia Power Nuclear Services Company 49. Virginia Power Services Energy Corp., Inc. 50. Virginia Power Services, LLC 51. WexPro Company 52. Dominion Solar Projects V, Inc.	
14	Duke Energy Business Services, LLC	1. Bison Insurance Company, Ltd 2. CINCAP V LLC 3. Cinergy Corp 4. Cinergy Investments, Inc. 5. Cinergy Receivables Co LLC 6. DE Commercial Enterprises Inc 7. DE Renewables Commercial LLC 8. DE Services Canada, LTD 9. DE Transmission Holding Company, LLC 10. DEGS NC Solar LLC 11. DEGS Solar, LLC 12. DEGS Wind I, LLC	<ul style="list-style-type: none"> <li>• Information Systems</li> <li>• Meters</li> <li>• Transportation</li> <li>• System Maintenance</li> <li>• Marketing and Customer Relations</li> <li>• Transmission and Distribution Engineering and Construction</li> <li>• Power Engineering and Construction</li> <li>• Human Resources</li> <li>• Supply Chain</li> <li>• Facilities</li> <li>• Accounting</li> <li>• Power and Gas Planning and Operations</li> <li>• Public Affairs</li> <li>• Legal</li> <li>• Rates</li> </ul>

		<ol style="list-style-type: none"> <li>13. DETMI Management, Inc.</li> <li>14. Duke Energy Carolinas, LLC</li> <li>15. Duke Energy Corp</li> <li>16. Duke Energy Florida (f/k/a Progress Energy Florida)</li> <li>17. Duke Energy Gen Service, Inc</li> <li>18. Duke Energy Indiana, Inc.</li> <li>19. Duke Energy International, LLC</li> <li>20. Duke Energy Kentucky, Inc.</li> <li>21. Duke Energy North America, LLC</li> <li>22. Duke Energy Ohio, Inc.</li> <li>23. Duke Energy Pipeline Holding</li> <li>24. Duke Energy Progress (f/k/a Progress Energy Carolinas, Inc.)</li> <li>25. Duke Energy Registration Services, Inc.</li> <li>26. Duke Generation Services Holding Co. Inc.</li> <li>27. Duke Investments, LLC</li> <li>28. Duke Technologies Inc.</li> <li>29. Frontier Windpower LLC</li> <li>30. KO Transmission</li> <li>31. Piedmont Natural Gas Company Inc</li> <li>32. Progress Energy Inc</li> <li>33. Texas Eastern Arabian Ltd.</li> </ol>	<ul style="list-style-type: none"> <li>• Finance</li> <li>• Rights of Way</li> <li>• Internal Auditing</li> <li>• Environmental</li> <li>• Health and Safety</li> <li>• Fuels</li> <li>• Investor Relations</li> <li>• Planning</li> <li>• Executive</li> <li>• Nuclear Development</li> </ul>
15	Entergy Enterprises, Inc	<ol style="list-style-type: none"> <li>1. EAM Nelson Holding, LLC</li> <li>2. EK Holding III, LLC</li> <li>3. EN Services LP</li> <li>4. Entergy Asset Management</li> <li>5. Entergy Corporation</li> <li>6. Entergy Global, LLC</li> <li>7. Entergy Int Holdings Ltd, LLC</li> </ol>	<ul style="list-style-type: none"> <li>• Administration</li> <li>• Capital Project Excellence</li> <li>• Chief Administrative Officer</li> <li>• Corporate</li> <li>• Corporate - Legal Services</li> <li>• Corporate - Office of the Chief</li> <li>• Executive Officer</li> <li>• Corporate - Public Relations</li> <li>• Corporate Support – General</li> </ul>

		<ol style="list-style-type: none"> <li>8. Entergy International Ltd, LLC</li> <li>9. Entergy Nighthawk, L.P.</li> <li>10. Entergy Nuclear FitzPatrick, LLC</li> <li>11. Entergy Nuclear Generation Company</li> <li>12. Entergy Nuclear Holding Corp-No. 1</li> <li>13. Entergy Nuclear Indian Point 2, LLC</li> <li>14. Entergy Nuclear Indian Point 3, LLC</li> <li>15. Entergy Nuclear Nebraska, LLC</li> <li>16. Entergy Nuclear Operations, Inc.</li> <li>17. Entergy Nuclear Palisades, LLC</li> <li>18. Entergy Nuclear Power Mktg, LLC</li> <li>19. Entergy Nuclear Vermont Investment Corp</li> <li>20. Entergy Nuclear Vermont Yankee LLC</li> <li>21. Entergy Nuclear, Inc.</li> <li>22. Entergy Power E&amp;C Holding, LLC</li> <li>23. Entergy Power Ops U.S. Inc.</li> <li>24. Entergy Power RS, LLC</li> <li>25. Entergy Power, LLC</li> <li>26. Entergy Resources, Inc.</li> <li>27. Entergy Services, Inc.</li> <li>28. Entergy Solutions Ltd</li> <li>29. Entergy Tech Holding Co-Parent</li> <li>30. EP Gas Holding Corp</li> <li>31. EP Gas Operations Corp</li> <li>32. EWO Marketing LLC</li> <li>33. EWO WIND II – EPGC</li> <li>34. TLG Services, Inc.</li> <li>35. Varibus, LLC</li> </ol>	<ul style="list-style-type: none"> <li>• Entergy Asset Management – EAM</li> <li>• Finance - Finance and Accounting</li> <li>• Finance - Risk Management</li> <li>• Human Resources</li> <li>• Information Technology</li> <li>• Operations and Performance</li> <li>• Supply Chain</li> <li>• System Benefits</li> <li>• Transmission</li> <li>• Wholesale Ops - Energy Management</li> <li>• Wholesale Ops Corporate Support</li> <li>• Wholesale Ops External Affairs</li> <li>• Wholesale Ops Finance</li> <li>• Wholesale Ops Marketing</li> </ul>
16	Entergy Nuclear Operations, Inc	<ol style="list-style-type: none"> <li>1. Entergy Arkansas, Inc.</li> <li>2. Entergy Corporation</li> <li>3. Entergy Enterprises, Inc.</li> </ol>	<ul style="list-style-type: none"> <li>• Administration</li> <li>• Capital Project Excellence</li> <li>• Chief Administrative Officer</li> </ul>

		<ol style="list-style-type: none"> <li>4. Entergy Louisiana, LLC</li> <li>5. Entergy Nuclear Holding Corp-No. 1</li> <li>6. Entergy Nuclear FitzPatrick, LLC</li> <li>7. Entergy Nuclear Generation Company</li> <li>8. Entergy Nuclear Indian Point 2, LLC</li> <li>9. Entergy Nuclear Indian Point 3, LLC</li> <li>10. Entergy Nuclear Nebraska, LLC</li> <li>11. Entergy Nuclear Palisades, LLC</li> <li>12. Entergy Nuclear Power Marketing, LLC</li> <li>13. Entergy Nuclear Vermont Yankee, LLC</li> <li>14. Entergy Nuclear, Inc.</li> <li>15. Entergy Operations Inc.</li> <li>16. Entergy Services, Inc.</li> <li>17. System Energy Resources, Inc.</li> <li>18. TLG Services, Inc</li> </ol>	<ul style="list-style-type: none"> <li>• Corporate</li> <li>• Corporate - Legal Services</li> <li>• Corporate - Office of the Chief Executive Officer</li> <li>• Corporate - Public Relations</li> <li>• Corporate Support - General</li> <li>• Customer Service and Operations Support</li> <li>• Customer Service Support</li> <li>• Distribution</li> <li>• Finance - Finance and Accounting</li> <li>• Finance - Risk Management</li> <li>• Fossil Operations</li> <li>• Gas Operations</li> <li>• Human Resources</li> <li>• Information Technology</li> <li>• Nuclear - Non-Regulated</li> <li>• Nuclear - Regulated</li> <li>• Nuclear Corporate Support</li> <li>• Nuclear Operations</li> <li>• Operations and Performance</li> <li>• President</li> <li>• Regulatory</li> <li>• Supply Chain</li> <li>• System Benefits</li> <li>• System Planning</li> <li>• Transmission</li> <li>• Utility Management and Support Services</li> <li>• Utility Support - Distribution</li> <li>• Utility Support - Operations</li> <li>• Wholesale Ops Corporate Support</li> <li>• Wholesale Ops External Affairs</li> <li>• Wholesale Ops Finance</li> <li>• Wholesale Ops Marketing</li> </ul>
17	Entergy Operations, Inc.	<ol style="list-style-type: none"> <li>1. Entergy Arkansas, Inc.,</li> <li>2. Entergy Corporation,</li> <li>3. Entergy Enterprises, Inc.,</li> <li>4. Entergy Louisiana, LLC,</li> <li>5. Entergy Nuclear Holding Corp-No. 1,</li> <li>6. Entergy Nuclear FitzPatrick, LLC,</li> <li>7. Entergy Nuclear Generation Company,</li> </ol>	<ul style="list-style-type: none"> <li>• Administration,</li> <li>• Capital Project Excellence</li> <li>• Chief Administrative Officer, Corporate</li> <li>• Corporate - Legal Services</li> <li>• Corporate - Office of the Chief Executive, Officer</li> <li>• Corporate - Public Relations</li> <li>• Corporate Support - General</li> <li>• Customer Service and Operations Support</li> </ul>

		<ol style="list-style-type: none"> <li>8. Entergy Nuclear Indian Point 2, LLC,</li> <li>9. Entergy Nuclear Indian Point 3, LLC,</li> <li>10. Entergy Nuclear Nebraska, LLC,</li> <li>11. Entergy Nuclear Palisades, LLC,</li> <li>12. Entergy Nuclear Power Marketing, LLC,</li> <li>13. Entergy Nuclear Vermont Yankee, LLC,</li> <li>14. Entergy Nuclear, Inc.,</li> <li>15. Entergy Operations Inc.,</li> <li>16. Entergy Services, Inc.,</li> <li>17. System Energy Resources, Inc.,</li> <li>18. TLG Services, Inc</li> </ol>	<ul style="list-style-type: none"> <li>• Customer Service Support, Distribution</li> <li>• Finance - Finance and Accounting</li> <li>• Finance - Risk Management</li> <li>• Fossil Operations</li> <li>• Gas Operations</li> <li>• Human Resources</li> <li>• Information Technology</li> <li>• Nuclear - Non-Regulated</li> <li>• Nuclear - Regulated</li> <li>• Nuclear Corporate Support</li> <li>• Nuclear Operations</li> <li>• Operations and Performance</li> <li>• President</li> <li>• Regulatory</li> <li>• Supply Chain</li> <li>• System Benefits</li> <li>• System Planning</li> <li>• Transmission</li> <li>• Utility Management and Support Services</li> <li>• Utility Support - Distribution</li> <li>• Utility Support - Operations</li> <li>• Wholesale Ops Corporate Support</li> <li>• Wholesale Ops External Affairs</li> <li>• Wholesale Ops Finance</li> <li>• Wholesale Ops Marketing</li> </ul>
18	Entergy Services, Inc	<ol style="list-style-type: none"> <li>1. Entergy Arkansas, Inc.,</li> <li>2. Entergy Corporation,</li> <li>3. Entergy Enterprises, Inc.,</li> <li>4. Entergy Louisiana, LLC,</li> <li>5. Entergy Mississippi, Inc.,</li> <li>6. Entergy New Orleans, LLC,</li> <li>7. Entergy Nuclear Operations, Inc.,</li> <li>8. Entergy Operations, Inc.,</li> <li>9. Entergy Services, Inc.,</li> <li>10. Entergy Texas, Inc.,</li> <li>11. System Energy Resources, Inc.</li> </ol>	<ul style="list-style-type: none"> <li>• Administration</li> <li>• Capital Project Excellence</li> <li>• Chief Administrative Officer, Corporate</li> <li>• Corporate - Legal Services</li> <li>• Corporate - Office of the Chief Executive Officer</li> <li>• Corporate - Public Relations</li> <li>• Corporate Support - General</li> <li>• Customer Service and Operations Support</li> <li>• Customer Service Support, Distribution</li> <li>• Finance - Finance and Accounting</li> <li>• Finance - Risk Management</li> <li>• Fossil Operations</li> <li>• Gas Operations</li> </ul>



			<ul style="list-style-type: none"> <li>• Human Resources</li> <li>• Information Technology</li> <li>• Nuclear - Non-Regulated</li> <li>• Nuclear - Regulated</li> <li>• Nuclear Corporate Support</li> <li>• Operations and Performance</li> <li>• President</li> <li>• Regulatory</li> <li>• Supply Chain</li> <li>• System Benefits</li> <li>• System Planning</li> <li>• Transmission</li> <li>• Utility Management and Support Services</li> <li>• Utility Support - Distribution</li> <li>• Utility Support - Operations</li> <li>• Wholesale Ops Corporate Support</li> <li>• Wholesale Ops External Affairs</li> <li>• Wholesale Ops Finance</li> </ul>
19	Eversource Energy Service Company	<ol style="list-style-type: none"> <li>1. Connecticut Light and Power Company</li> <li>2. Eversource Energy Parent</li> <li>3. Eversource Energy Transmission Ventures Inc.</li> <li>4. Eversource Gas Transmission II LLC</li> <li>5. Eversource Gas Transmission LLC</li> <li>6. Eversource Investment LLC</li> <li>7. Eversource Investment Service Company</li> <li>8. Eversource LNG Service Company LLC</li> <li>9. Harbor Electric Energy Company</li> <li>10. Hopkinton LNG Corp</li> <li>11. HWP Company</li> <li>12. North Atlantic Energy Corporation</li> <li>13. North Atlantic Energy Service Corporation</li> <li>14. Northeast Generation Services Company</li> <li>15. Northern Pass Transmission LLC</li> </ol>	<ul style="list-style-type: none"> <li>• Benefits</li> <li>• Building Rent and Maintenance</li> <li>• Corporate Relations</li> <li>• Customer Group</li> <li>• Depreciation</li> <li>• Electric Distribution</li> <li>• Energy Supply</li> <li>• Engineering and Emergency Prep</li> <li>• Enterprise Energy Strat + Bus Dev</li> <li>• ERM and Claims + Insurance</li> <li>• Finance and Accounting</li> <li>• General Administration</li> <li>• Human Resources</li> <li>• Information Technology</li> <li>• Internal Audit + Security</li> <li>• Investor Relations</li> <li>• Legal</li> <li>• Miscellaneous</li> <li>• New Business Improvement</li> <li>• Operations Administration</li> <li>• Operations Services</li> <li>• Supply Chain + Env Affs + Property Mgmt</li> <li>• Taxes</li> <li>• Transmission</li> </ul>

		16. NSTAR Electric Company 17. NSTAR Gas Company 18. NU Enterprises Properties Inc 19. Public Service Company of New Hampshire 20. Renewable Properties Inc 21. The Rocky River Realty Company 22. Western Massachusetts Electric Company 23. Yankee Energy System Inc 24. Yankee Gas Services Company	
20	Exelon Business Services Company, LLC	1. Atlantic City Electric Co. 2. ATNP Finance Company 3. Baltimore Gas and Electric Company 4. BGE Home Products & Services, LLC 5. Clinton Battery Utility, LLC 6. Colorado Bend II Power, LLC 7. Commonwealth Edison Company 8. Constellation Energy Comm Grp. 9. Constellation Energy Nuclear Group, LLC (dba CENG, LLC) 10. Constellation Mystic Pwr, LLC 11. Constellation NewEnergy, Inc 12. Constellation Power Source Gen. 13. Constellation Power, Inc. 14. Delmarva Power & Light Co. 15. Exelon Corporation 16. Exelon Enterprises Company, LLC	<ul style="list-style-type: none"> <li>• Communications</li> <li>• Corporate Governance (including Corporate Secretary)</li> <li>• Corporate Security</li> <li>• Corporate Strategy</li> <li>• Corporate Development</li> <li>• Executive</li> <li>• Finance</li> <li>• General Company Activities including interest severance and income taxes</li> <li>• Government Affairs and Public Policy</li> <li>• Legal Services</li> <li>• Transmission Operations and Planning</li> <li>• Human Resources</li> <li>• Human Resources - Labor Relations</li> <li>• Real Estate Services</li> <li>• Supply – purchasing / activities related to materials</li> <li>• Supply – purchasing / activities related to services</li> <li>• Supply – combined materials and services related purchasing / activities</li> <li>• Supply Administration</li> <li>• Credit card purchases</li> <li>• IT related to corporate governance areas</li> </ul>

		<ol style="list-style-type: none"> <li>17. Exelon Framingham, LLC</li> <li>18. Exelon Generation Company, LLC</li> <li>19. Exelon Generation Finance Company, LLC</li> <li>20. Exelon Generation Texas Power, LLC</li> <li>21. Exelon New Boston, LLC</li> <li>22. Exelon New England Holdings, LLC</li> <li>23. Exelon Nuclear Security, LLC</li> <li>24. Exelon PowerLabs, LLC</li> <li>25. Exelon Transmission Company, LLC</li> <li>26. Exelon West Medway, LLC</li> <li>27. Exelon West Medway II, LLC</li> <li>28. Exelon Wind, LLC</li> <li>29. Exelon Wyman, LLC</li> <li>30. ExTex LaPorte Limited Partnership</li> <li>31. PECO Energy Company</li> <li>32. PEPCO Holdings Inc.</li> <li>33. PHI Service Company</li> <li>34. Potomac Electric Power Co.</li> <li>35. RITELine Illinois, LLC</li> <li>36. RITELine Transmission Development, LLC</li> <li>37. Wolf Hollow II Power, LLC.</li> </ol>	<ul style="list-style-type: none"> <li>• IT related to utility customer systems</li> <li>• IT related to Human Resources</li> <li>• IT projects and applications</li> <li>• IT governance and other items of general nature</li> </ul>
21	FirstEnergy Service Company	<ol style="list-style-type: none"> <li>1. FirstEnergy Corp.</li> <li>2. FirstEnergy Solutions Corporation</li> <li>3. FirstEnergy Generation, LLC</li> <li>4. FirstEnergy Nuclear Generation, LLC</li> <li>5. Allegheny Energy Supply, LLC</li> <li>6. Allegheny Generating Company</li> <li>7. FirstEnergy Nuclear Operating Company</li> </ol>	<ul style="list-style-type: none"> <li>• Chairman of the Board</li> <li>• President &amp; CEO</li> <li>• FirstEnergy Service Company</li> <li>• President</li> <li>• FE Utilities</li> <li>• Transmission</li> <li>• Distribution Support</li> <li>• Utility Operations</li> <li>• Compliance &amp; Reg. Services</li> <li>• Customer Service</li> <li>• Energy Efficiency</li> <li>• President</li> <li>• FE Generation &amp; CNO</li> </ul>

		<ol style="list-style-type: none"> <li>8. American Transmission Systems Incorporated</li> <li>9. FirstEnergy Transmission, LLC</li> <li>10. Trans-Allegheny Interstate Line Company</li> <li>11. AET PATH Company, LLC</li> <li>12. PATH, LLC</li> <li>13. AYE Series</li> <li>14. PATH Allegheny Transmission Company, LLC</li> <li>15. PATH Allegheny Virginia Transmission Corporation</li> <li>16. PATH Allegheny Maryland Transmission Co, LLC</li> <li>17. Mid-Atlantic Interstate Transmission, LLC</li> <li>18. FirstEnergy Ventures Corporation</li> <li>19. Bay Shore Power Company</li> <li>20. FirstEnergy Properties, Inc.</li> <li>21. Allegheny Ventures</li> <li>22. The Cleveland Electric Illuminating Company</li> <li>23. Jersey Central Power &amp; Light Company</li> <li>24. Metropolitan Edison Company</li> <li>25. Monongahela Power Company</li> <li>26. Ohio Edison Company</li> <li>27. The Potomac Edison Company</li> <li>28. Pennsylvania Electric Company</li> <li>29. Pennsylvania Power Company</li> <li>30. The Toledo Edison Company</li> <li>31. West Penn Power Company</li> </ol>	<ul style="list-style-type: none"> <li>• Environmental</li> <li>• EVP &amp; Chief Financial Officer</li> <li>• Strategic Planning &amp; Operations</li> <li>• Corporate Services &amp; CIO</li> <li>• Supply Chain</li> <li>• Controller</li> <li>• Treasury</li> <li>• Corporate Risk</li> <li>• Business Development</li> <li>• Integrated System Planning &amp; Development</li> <li>• Internal Auditing</li> <li>• Legal</li> <li>• Rates &amp; Regulatory Affairs</li> <li>• Corporate</li> <li>• Real Estate</li> <li>• Records Management</li> <li>• External Affairs &amp; Communications</li> <li>• Corporate Affairs &amp; Community Involvement</li> <li>• Federal Affairs &amp; Energy Policy</li> <li>• Local Affairs &amp; Economic Development</li> <li>• State Affairs</li> <li>• Human Resources</li> <li>• FE Generation &amp; CNO</li> <li>• Marketing &amp; Branding</li> </ul>
22	Great Plains Energy Services Incorporated	<ol style="list-style-type: none"> <li>1. KCP&amp;L Greater Missouri Operations Company</li> </ol>	<ul style="list-style-type: none"> <li>• Administrative</li> <li>• Management</li> </ul>

		<ol style="list-style-type: none"> <li>2. Kansas City Power &amp; Light Company</li> <li>3. Great Plains Energy Incorporated</li> <li>4. KLT Investments Inc.</li> </ol>	<ul style="list-style-type: none"> <li>• Environmental</li> <li>• Support Services</li> </ul>
23	GridLiance Management, LLC	<ol style="list-style-type: none"> <li>5. Midcontinent MCN LLC,</li> <li>6. South Central MCN LLC,</li> <li>7. Mid-Atlantic MCN LLC,</li> <li>8. GridLiance West Transco LLC,</li> <li>9. GridLiance Heartland LLC,</li> <li>10. GridLiance West Holdings LLC</li> </ol>	<ul style="list-style-type: none"> <li>• Legal</li> <li>• Payroll</li> <li>• Record-keeping</li> <li>• Administrative</li> <li>• IT services</li> </ul>
24	Iberdrola USA Management Corporation	<ol style="list-style-type: none"> <li>1. Avangrid, Inc.</li> <li>2. Cayuga Energy, LLC</li> <li>3. Avangrid Renewables, LLC</li> <li>4. Avangrid Networks, Inc.</li> <li>5. New York State Electric and Gas Corporation</li> <li>6. Rochester Gas and Electric Corporation</li> <li>7. RGS Energy Group, Inc.</li> <li>8. Avangrid Solutions, Inc.</li> <li>9. Central Maine Power Company</li> <li>10. CMP Group, Inc.</li> <li>11. The Union Water Power Company</li> <li>12. Maine Electric Power Company</li> <li>13. NORVARCO</li> <li>14. Chester SVC Partnership</li> <li>15. CNE Energy Services Group</li> <li>16. Ten Transmission Company</li> <li>17. Avangrid Enterprises, Inc.</li> <li>18. Maine Natural Gas Corporation</li> <li>19. Enstor Gas, LLC</li> </ol>	<ul style="list-style-type: none"> <li>• Innovation</li> <li>• Environment &amp; Quality</li> <li>• Real Estate and General Services</li> <li>• Corporate Security</li> <li>• IT</li> <li>• Human Resources</li> <li>• Purchasing</li> <li>• Insurance</li> <li>• Finance and Treasury</li> <li>• Risks</li> <li>• Control</li> <li>• Administration</li> <li>• Tax</li> <li>• Communications</li> <li>• Legal Services</li> <li>• Corporate Development</li> <li>• DG Business and Regulation</li> <li>• External Audit</li> <li>• Secretary of the Board</li> <li>• Internal Audit</li> <li>• Compliance</li> </ul>

		20. Iberdrola Canada Energy 21. Iberdrola S.A. 22. Scottish Power	
25	IntegrYS Business Support, LLC	1. AMP Trillium, LLC 2. Combined Locks Energy Center, LLC 3. Compass Energy Gas Services, LLC 4. Compass Energy Services, Inc. 5. IES - Natural Gas, LLC 6. IntegrYS Energy Group, Inc. 7. IntegrYS Energy of New York, Inc. 8. IntegrYS Energy Services, Inc. 9. IntegrYS Solar, LLC 10. IntegrYS Transportation Fuels, LLC 11. LGS Renewables 1, LC 12. Michigan Gas Utilities Corporation 13. Minnesota Energy Resources Corporation 14. North Shore Gas Company 15. Penvest, Inc. 16. Peoples Energy, LLC 17. Pinnacle CNG Company, LLC 18. Pinnacle CNG Systems, LLC 19. Solar Hold 2008-1, LLC 20. The Peoples Gas Light and Coke Company 21. Trillium USA Company, LLC 22. Trillium USA, LLC 23. Upper Peninsula Power Company 24. Winnebago Energy Center, LLC 25. Wisconsin Public Service Corporation 26. Wisconsin River Power Company 27. WPS Empire State, Inc. 28. WPS Investments, LLC	<ul style="list-style-type: none"> <li>• Administrative services</li> <li>• Corporate development</li> <li>• Corporate secretary</li> <li>• Environmental</li> <li>• Executive management</li> <li>• Governmental Relations</li> <li>• Corporate Communications and Regulatory Processes</li> <li>• Financial services</li> <li>• Human resources</li> <li>• Information technology</li> <li>• Legal services</li> <li>• Supply chain</li> <li>• Engineering Services</li> <li>• Gas supply</li> <li>• Customer relations</li> <li>• Project Services</li> </ul>

		29. WPS Power Development, Inc	
26	LG&E and KU Services Company	<ol style="list-style-type: none"> <li>1. Louisville Gas and Electric Company</li> <li>2. Kentucky Utilities Company</li> <li>3. Western Kentucky Energy Corp.</li> <li>4. FCD LLC</li> <li>5. LG&amp;E and KU Capital LLC</li> <li>6. PPL Corporation</li> <li>7. PPL Services Corporation</li> <li>8. PPL Electric Utilities Corporation</li> </ol>	<ul style="list-style-type: none"> <li>• Customer Service</li> <li>• Sales and Marketing</li> <li>• Economic Development and Major Accounts</li> <li>• Meter Reading Services</li> <li>• Cash Remittance</li> <li>• Billing Integrity</li> <li>• Energy Efficiency</li> <li>• Smart Grid Strategy</li> <li>• Field Services</li> <li>• CCS Retail Business Readiness</li> <li>• Project Engineering</li> <li>• System Laboratory</li> <li>• Generation</li> <li>• Generation Services and Safety</li> <li>• Fuel Procurement</li> <li>• Project Development</li> <li>• Strategy</li> <li>• Reliability and Tariffs</li> <li>• Operations and Construction</li> <li>• Reliability and Compliance</li> <li>• Energy Marketing</li> <li>• Market Forecasting</li> <li>• Load Forecasting</li> <li>• Generation Planning and Analysis</li> <li>• Network Trouble and Dispatch</li> <li>• Electric Engineering</li> <li>• Distribution Asset Management</li> <li>• Forestry</li> <li>• Substation Construction and Maintenance</li> <li>• Budgeting</li> <li>• Financial Planning</li> <li>• Accounting and Reporting</li> <li>• Property Accounting</li> <li>• Revenue Accounting</li> <li>• Payroll</li> <li>• Tax Accounting</li> <li>• Compliance and Reporting</li> <li>• Treasury and Corporate Finance</li> <li>• Risk Management</li> <li>• Credit Administration</li> <li>• Energy Marketing Trading Controls</li> <li>• Supply Chain</li> </ul>

			<ul style="list-style-type: none"> <li>• Accounts Payable</li> <li>• IT Security</li> <li>• IT Applications Development and Support</li> <li>• IT Infrastructure and Operations</li> <li>• IT Governance</li> <li>• IT Business Services</li> <li>• IT Major Projects</li> <li>• Legal</li> <li>• Compliance</li> <li>• Environmental Affairs</li> <li>• Regulatory Affairs</li> </ul>
27	Liberty Energy Utilities (New Hampshire) Corp	<ol style="list-style-type: none"> <li>1. Liberty Utilities (Granite State Electric) Corp.</li> <li>2. Liberty Utilities (EnergyNorth Natural Gas) Corp.</li> <li>3. Liberty Utilities (Canada) Corp.</li> <li>4. Liberty Utilities (Midstates Natural Gas) Corp.</li> <li>5. Liberty Utilities (Calpeco Electric) LLC</li> </ol>	<ul style="list-style-type: none"> <li>• No services listed</li> </ul>
28	Liberty Utilities (Canada) Corp	<ol style="list-style-type: none"> <li>6. Liberty Utilities (CalPeco Electric) LLC</li> <li>7. Liberty Utilities (Pine Bluff) Inc.</li> <li>8. Liberty Utilities (Midstates Natural Gas) Corp.</li> <li>9. Liberty Utilities (Peach State Natural Gas) Corp.</li> <li>10. Liberty Utilities (Sub) Corp.</li> <li>11. Liberty Energy Utilities (New Hampshire) Corp.</li> <li>12. Liberty Utilities (Granite State Electric) Corp.</li> <li>13. Liberty Utilities (EnergyNorth Natural Gas) Corp.</li> <li>14. Liberty Utilities (New England Gas Co) Corp.</li> <li>15. Liberty Utilities (White Hall Water) Corp.</li> </ol>	<ul style="list-style-type: none"> <li>• Information Technology</li> <li>• Human Resources</li> <li>• Training</li> <li>• Environment</li> <li>• Health, Safety and Security</li> <li>• Facilities and Building Rent</li> <li>• Procurement</li> <li>• Executive and Strategic Management</li> <li>• Technical Services</li> <li>• Utility Planning</li> <li>• Risk Management</li> <li>• Financial Reporting</li> <li>• Planning &amp; Administration</li> <li>• Compliance</li> <li>• Treasury</li> <li>• Internal Audit</li> <li>• External Communications</li> <li>• Legal Costs</li> </ul>



		<ol style="list-style-type: none"> <li>16. Liberty Utilities (White Hall Sewer) Corp.</li> <li>17. Algonquin Power &amp; Utilities Corp.</li> <li>18. Algonquin Power Trust</li> <li>19. Liberty Utilities Co</li> <li>20. Liberty Utilities Energy Solutions Corp.</li> <li>21. Liberty Utilities (Pipeline &amp; Transmission) Corp.</li> <li>22. Davis Road LLP</li> <li>23. Mountain Water Company</li> <li>24. Liberty Utilities (Park Water) Corp.</li> <li>25. Liberty Utilities (Apple Valley Ranchos Water) Corp.</li> <li>26. Liberty Utilities Services Corp.</li> <li>27. Algonquin Power Tinker Transmission</li> <li>28. Empire Electric District</li> <li>29. Liberty Utilities (Woodson-Hensley Water) Corp.</li> <li>30. Blue Duchess Co Inc</li> <li>31. Blue Duchess Co S.a.r.l.</li> <li>32. Green Duchess Co Inc</li> <li>33. Green Duchess Co S.a.r.l.</li> <li>34. Éoliennes Belle-Rivière Inc.</li> <li>35. Great Bay Solar I, LLC</li> <li>36. Project Co (Odell Wind Farm, LLC)</li> <li>37. Deerfield Wind Energy, LLC</li> <li>38. Windelectric Inc.</li> </ol>	
29	Liberty Utilities Service Corp	<ol style="list-style-type: none"> <li>1. Liberty Utilities (Peach State Natural Gas) Corp.</li> <li>2. Liberty Utilities Energy Solutions Corp.</li> <li>3. Liberty Utilities (CalPeco Electric) LLC</li> <li>4. Liberty Utilities (Sub) Corp.</li> </ol>	<ul style="list-style-type: none"> <li>• Information Technology</li> <li>• Human Resources</li> <li>• Training</li> <li>• Environment</li> <li>• Health, Safety and Security</li> <li>• Facilities and Building Rent</li> <li>• Procurement</li> <li>• Executive and Strategic Management</li> </ul>

		<ol style="list-style-type: none"> <li>5. Liberty Utilities (Pine Bluff Water) Inc.</li> <li>6. Liberty Utilities (New England Gas Co) Corp.</li> <li>7. Liberty Energy (Midstates Natural Gas) Corp.</li> <li>8. Liberty Utilities (Canada) Corp.</li> <li>9. Liberty Utilities Co</li> <li>10. Algonquin Power &amp; Utilities Corp.</li> <li>11. Liberty Utilities (Pipeline &amp; Transmission) Corp.</li> <li>12. Liberty Energy Utilities (New Hampshire) Corp.</li> <li>13. Algonquin Windsor Locks</li> <li>14. Liberty Utilities (Park Water) Corp.</li> <li>15. Liberty Utilities (White Hall Water) Corp.</li> <li>16. Liberty Utilities (White Hall Sewer) Corp.</li> <li>17. Liberty Utilities (Woodson-Hensley Water) Corp.</li> <li>18. Empire District Electric Company</li> <li>19. Liberty Power</li> <li>20. Algonquin Power Sanger LLC</li> </ol>	<ul style="list-style-type: none"> <li>• Technical Services</li> <li>• Utility Planning</li> <li>• Risk Management</li> <li>• Financial Reporting</li> <li>• Planning and Administration</li> <li>• Compliance</li> <li>• Treasury</li> <li>• Internal Audit</li> <li>• External Communications</li> <li>• Legal Costs</li> </ul>
30	National Grid Engineering & Survey, Inc	<ol style="list-style-type: none"> <li>1. Boston Gas Company</li> <li>2. Brooklyn Union Gas-KEDNY</li> <li>3. Colonial Gas Company</li> <li>4. Massachusetts Electric Co</li> <li>5. Nantucket Electric Co</li> <li>6. NE Electric Trans Corp</li> <li>7. NE Hydro-Trans Corp</li> <li>8. NE Hydro-Trans Elec Co</li> <li>9. New England Power Company</li> <li>10. NG Corporation</li> <li>11. NG Development Holdings Corp</li> <li>12. NG Energy Trading Srvc</li> </ol>	<ul style="list-style-type: none"> <li>• Maintenance and Construction</li> <li>• Electric Power Plant Operations</li> <li>• Management of Complex Construction Projects</li> <li>• Resource Planning and Response and Operations Performance activities</li> </ul>

		13. NG Gas East Corp-KEDLI 14. NG Generation LLC 15. NG Glenwood Energy Center 16. NG LNG LP Regulated Entity 17. NG Port Jeff Energy Center 18. NG Services, Inc. 19. NG USA Parent 20. NGUSA Service Company 21. Niagara Mohawk Power Corp 22. Transgas Inc 23. Narragansett Electric Co	
31	National Grid USA Service Company Inc	1. Boston Gas Company 2. Brooklyn Union Gas-KEDNY 3. Colonial Gas Company 4. EUA Energy Investment 5. GridAmerica Holdings Inc. 6. Massachusetts Electric Co 7. Nantucket Electric Co 8. Narragansett Electric Co 9. NE Electric Trans Corp 10. NE Hydro-Trans Corp 11. NE Hydro-Trans Elec Co 12. New England Power Company 13. NG Development Holdings Corp 14. NG Energy Management LLC 15. NG Energy Trading Svcs 16. NG Engineering Svcs, LLC 17. NG Gas East Corp-KEDLI 18. NG Generation LLC 19. NG Glenwood Energy Center 20. NG Holdings, Inc.	<ul style="list-style-type: none"> <li>• Resource Planning</li> <li>• Emergency Planning PMO</li> <li>• Maintenance and Construction</li> <li>• Operations Performance</li> <li>• Control Center Operations</li> <li>• LNG Operations</li> <li>• Operations Support</li> <li>• Asset Management</li> <li>• Gas Systems Engineering</li> <li>• Electric Systems Engineering</li> <li>• Investment Planning</li> <li>• FERC Operations</li> <li>• Standards</li> <li>• Codes and Policies</li> <li>• Regulatory Support and Reporting</li> <li>• Safety</li> <li>• Health</li> <li>• Environment</li> <li>• Energy Solutions Delivery</li> <li>• Energy Products</li> <li>• Market Strategy and Implementation</li> <li>• Customer and Business Strategy</li> <li>• Energy Procurement</li> <li>• Lead Intake</li> <li>• Customer Analytics and Risk Management</li> <li>• Customer Care</li> <li>• Customer Operations Support</li> <li>• Regulatory Strategy</li> </ul>

		<ul style="list-style-type: none"> <li>21. NG LNG LP Regulated Entity</li> <li>22. NG NE Holdings 2 LLC</li> <li>23. NG Port Jeff Energy Center</li> <li>24. NG Services, Inc.</li> <li>25. NG UK</li> <li>26. NG USA Parent</li> <li>27. Niagara Mohawk Power Corp</li> <li>28. Transgas Inc</li> <li>29. Valley Appliance &amp; Merch</li> <li>30. Wayfinder Group, Inc.</li> <li>31. Granite St Elec-Post Sale</li> <li>32. EnergyNorth Gas-Post Sale</li> <li>33. NG Electric Services</li> <li>34. PSEG Electric Serv TSA Co</li> </ul>	<ul style="list-style-type: none"> <li>• Pricing and Federal Affairs</li> <li>• Labor &amp; Employee Relations</li> <li>• US HR Business Partner</li> <li>• Recruiting</li> <li>• Inclusion &amp; Diversity</li> <li>• HR Operations</li> <li>• Compensation</li> <li>• Benefits &amp; Pensions</li> <li>• Technical Training</li> <li>• Employee Services (SDC)</li> <li>• Procure to Pay (SDC)</li> <li>• Response Team (SDC)</li> <li>• Billing Operations (SDC)</li> <li>• Credit and Collections (SDC)</li> <li>• Business Process Excellence</li> <li>• Property Strategy</li> <li>• Facilities Management</li> <li>• Accounting Services</li> <li>• Finance Business Partnering</li> <li>• IS Finance</li> <li>• Corporate Planning and Reporting</li> <li>• US Jurisdictions (NY</li> <li>• MA</li> <li>• RI</li> <li>• Fed</li> <li>• and LI)</li> <li>• Solution Delivery</li> <li>• Service Delivery</li> <li>• Relationship Management</li> <li>• IS Security</li> <li>• Corporate Counsel</li> <li>• Litigation</li> <li>• Environment and Employment</li> <li>• Federal and State Regulatory</li> <li>• Technical Training</li> <li>• HR Business Partners</li> <li>• US Treasury</li> <li>• US Tax</li> <li>• US Insurance</li> <li>• Business Resiliency</li> <li>• US Investor Relations</li> <li>• Ethics and Business Conduct</li> <li>• Records Management</li> <li>• Real Estate</li> <li>• Corporate Counsel</li> <li>• Procurement Strategy</li> <li>• Sourcing</li> </ul>
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			<ul style="list-style-type: none"> <li>• Communications and Brand</li> <li>• Federal Affairs</li> <li>• Government Relations</li> <li>• Media Relations</li> <li>• Internal Audit</li> <li>• Business Development</li> <li>• Strategy</li> </ul>
32	NiSource Corporate Services Company	<ol style="list-style-type: none"> <li>1. Columbia Gas of Kentucky Inc</li> <li>2. Columbia Gas of Maryland Inc</li> <li>3. Columbia Gas of Massachusetts</li> <li>4. Columbia Gas of Ohio Inc</li> <li>5. Columbia Gas of Pennsylvania Inc</li> <li>6. Columbia Gas of Virginia Inc</li> <li>7. Columbia Gas of Ohio Receivables Corp</li> <li>8. Columbia Gas of PA Receivables Corp</li> <li>9. EnergyUSA Inc Indiana</li> <li>10. EnergyUSA TPC Corp</li> <li>11. NiSource Capital Markets Inc</li> <li>18. NiSource Development Co Inc</li> <li>19. NiSource Energy Technologies Inc</li> <li>20. NiSource Finance Corp</li> <li>21. NiSource Inc.</li> <li>22. NiSource Insurance Corp Inc</li> <li>23. Northern Indiana Public Svc Co</li> </ol>	<ul style="list-style-type: none"> <li>• Accounting and Statistical Services</li> <li>• Auditing Services</li> <li>• Budget Services</li> <li>• Business Services</li> <li>• Corporate Services</li> <li>• Customer Billing, Collection, and Contact Services</li> <li>• Employee Services</li> <li>• Engineering and Research Services</li> <li>• Facility Services</li> <li>• Gas Dispatching Services</li> <li>• Information Services</li> <li>• Information Technology Services</li> <li>• Insurance Services</li> <li>• Land/Surveying Services</li> <li>• Legal Services</li> <li>• Officers, Operations Support and Planning Services</li> <li>• Purchasing, Storage and Disposition Services</li> <li>• Regulatory Services</li> <li>• Tax Services</li> <li>• Transportation Services</li> <li>• Treasury Services</li> </ul>
33	Northeast Utilities Service Company	<ol style="list-style-type: none"> <li>1. NU Parent</li> <li>2. North Atlantic Energy Corporation</li> <li>3. Public Service Company of New Hampshire Properties Inc</li> <li>4. The Connecticut Light and Power Company</li> <li>5. Select Energy Contracting, Inc.</li> <li>6. NSTAR Electric Company</li> </ol>	<ul style="list-style-type: none"> <li>• Capital Expenditures</li> <li>• Labor</li> <li>• Operating Revenues</li> <li>• Customers</li> <li>• Direct Charged Costs</li> <li>• Facilities Floor Space</li> <li>• Gross Plant Assets</li> <li>• Invoices Processed</li> <li>• Common - Gross Plant Assets &amp; Net Income</li> <li>• PC Counts</li> <li>• Vehicles</li> </ul>

		<ol style="list-style-type: none"> <li>7. Select Energy, Inc.</li> <li>8. Hopkinton LNG Corp</li> <li>9. NSTAR Communications, Inc.</li> <li>10. Harbor Electric Energy Company</li> <li>11. NSTAR Gas Company</li> <li>12. Western Massachusetts Electric Company</li> <li>13. The Rocky River Realty Company</li> <li>14. E.S. Boulos</li> <li>15. Northeast Nuclear Energy Company</li> <li>16. NUSCO Eliminations</li> <li>17. NU Enterprises, Inc.</li> <li>18. North Atlantic Energy Service Corporation</li> <li>19. Yankee Energy System, Inc.</li> <li>20. Yankee Gas Services Company</li> <li>21. Yankee Energy Financial Services Company</li> <li>22. Yankee Energy Services Company</li> <li>23. HWP Company</li> <li>24. Northeast Services Generation Company</li> <li>25. Northeast Utilities Transmission Ventures, Inc.</li> <li>26. Northern Pass Transmission, LLC</li> <li>27. Renewable Properties, Inc.</li> </ol>	<ul style="list-style-type: none"> <li>• Customer Handle Time</li> <li>• Miscellaneous</li> </ul>
34	PHI Service Company	<ol style="list-style-type: none"> <li>1. Potomac Electric Company</li> <li>2. Delmarva Power &amp; Light Company</li> <li>3. Atlantic City Electric Company</li> <li>4. Exelon Business Services Company, LLC</li> <li>5. Pepco Energy Services, Inc</li> <li>6. Pepco Holdings LLC</li> <li>7. Atlantic Southern Properties, Inc</li> </ol>	<ul style="list-style-type: none"> <li>• Executive Management</li> <li>• Procurement and Administrative Services</li> <li>• Security</li> <li>• Storeroom Procurement and Materials Management</li> <li>• Vehicle Resource Management</li> <li>• General Services</li> <li>• Building Services (facilities cost)</li> <li>• Real Estate Services</li> <li>• Conference Center Usage</li> <li>• Mail</li> </ul>

		8. Conectiv Properties & Investments, Inc 9. Atlantic City Electric Transition Funding, LLC 10. Conectiv Holding Company, Inc. 11. Potomac Capital Investments Corporation 12. Conectiv Thermal Systems, Inc.	<ul style="list-style-type: none"> <li>• Records Retention Management and Reprographic Services</li> <li>• Financial Services and Corporate Expenses</li> <li>• Accounts Payable</li> <li>• Payroll Accounting Services</li> <li>• Asset and Project Accounting Services</li> <li>• All Other Financial Services</li> <li>• Salary Accruals</li> <li>• Other Corporate Expenses</li> <li>• Insurance Coverage and Services</li> <li>• Property Insurance</li> <li>• General Liability Insurance</li> <li>• Directors and Officers Insurance</li> <li>• Vehicle Insurance</li> <li>• Insurance Administration Services</li> <li>• Miscellaneous Insurance</li> <li>• Claims Administration Services</li> <li>• Human Resources</li> <li>• Cost of Benefits</li> <li>• Executive Compensation Services</li> <li>• All Other Human Resources Services</li> <li>• Legal Services</li> <li>• Audit Services</li> <li>• Customer Services</li> <li>• Special Billing</li> <li>• All Other Customer Services</li> <li>• Information Technology</li> <li>• Telephone and Related Items</li> <li>• Infrastructure and Application Systems Support</li> <li>• Mainframe and Operating Systems</li> <li>• Storage</li> <li>• Other IT Services</li> <li>• External Affairs</li> <li>• Utility Customer Communications</li> <li>• All other External Affairs</li> <li>• Environmental Services</li> <li>• Safety Services</li> </ul>
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			<ul style="list-style-type: none"> <li>• Regulated Electric and Gas Delivery System</li> <li>• Operations Services</li> <li>• Meter Maintenance and Testing Services</li> <li>• Power Procurement and Energy Planning</li> <li>• Other Delivery Services</li> <li>• Internal Consulting Services</li> </ul>
35	PNMR Services Company	1. PNM, PNMR Holding Company, TNMP	<ul style="list-style-type: none"> <li>• Financial Systems</li> <li>• Accounts Payable</li> <li>• Asset Management</li> <li>• Direct-PNMR Utility</li> <li>• Utility General</li> <li>• Direct-PNM Utility</li> <li>• IT Telecommunications</li> <li>• IT Infrastructure</li> <li>• Building services</li> <li>• Aztec Building</li> <li>• Internal Audit</li> <li>• Workman's' Compensation</li> <li>• Property Insurance</li> <li>• Legal Services</li> </ul>
36	PPL EU Services Corporation	<ol style="list-style-type: none"> <li>1. PPL Services Corporation</li> <li>2. PPL Strategic Development, LLC</li> <li>3. PPL Electric Utilities Corporation</li> <li>4. PPL Infrastructure Services, LLC</li> <li>5. PPL TransLink, Inc.</li> </ol>	<ul style="list-style-type: none"> <li>• Communications</li> <li>• Safety</li> <li>• Training</li> <li>• Vehicle/Equipment Leases</li> <li>• Office Supplies</li> <li>• Interior Structures</li> <li>• Equipment Preventative Maintenance</li> <li>• Operations</li> <li>• Furniture Maintenance &amp; Repair</li> <li>• Grounds Maintenance</li> <li>• Cleaning Services</li> <li>• Facilities Projects</li> <li>• Tenant Services</li> <li>• Customer Requests</li> <li>• Rent - Electric Utilities Buildings</li> <li>• Rent - Plaza Building</li> <li>• Rent - Windsor Data Center</li> <li>• NERC Support</li> <li>• Electric Usage</li> <li>• FM Software</li> <li>• Energy Acquisition</li> <li>• IT Oversight</li> </ul>



			<ul style="list-style-type: none"> <li>• Keystone Solar Future Project</li> <li>• Planning &amp; Analysis</li> <li>• Property Accounting</li> <li>• Strategic Development Support</li> <li>• Human Resources</li> <li>• Administrative and Leadership Functions</li> <li>• Contract Management</li> <li>• Corporate &amp; Indirect Supply</li> <li>• Materials Sourcing</li> <li>• Warehouse Support</li> <li>• Supply Chain</li> <li>• Technical Development &amp; Improvement</li> </ul>
37	PPL Services Corporation	<ol style="list-style-type: none"> <li>1. PPL Corporation</li> <li>2. PPL Capital Funding, Inc.</li> <li>3. PPL Strategic Development, LLC</li> <li>4. PPL Eu Services Corporation</li> <li>5. CEP Reserves, Inc.</li> <li>6. CEP Lending, Inc.</li> <li>7. PPL Electric Utilities Corporation</li> <li>8. PPL Infrastructure Services, LLC</li> <li>9. PPL TransLink, Inc.</li> <li>10. PPL Uk Holdings, LLC</li> <li>11. PPL Global, LLC</li> <li>12. PMDC International Holdings, Inc.</li> <li>13. PPL Barbados SRL, LG&amp;E and JU Services Company</li> </ol>	<ul style="list-style-type: none"> <li>• Auditing</li> <li>• SOX Control Testing</li> <li>• Sox Compliance</li> <li>• Business Ethics</li> <li>• Office Of President - Net Jet</li> <li>• Corporate Compliance Officer</li> <li>• Strategic Development Support</li> <li>• Access and Identity Management</li> <li>• Cyber Security Risk Management</li> <li>• Cyber Security Monitoring and Protections</li> <li>• Compliance</li> <li>• Records Separation</li> <li>• Financial Support</li> <li>• Accounting Services</li> <li>• International Tax Compliance &amp; Planning</li> <li>• Tax Compliance &amp; Reporting-EU</li> <li>• Audit/PCAOB Fees</li> <li>• Financial Reporting</li> <li>• Internal Reporting</li> <li>• Financial Consulting Services</li> <li>• FinSupport for Delaware Co's</li> <li>• Investor Relations</li> <li>• Billing</li> <li>• Remittance Processing</li> <li>• Credit Services</li> <li>• Vendor Servicing(Corporate Disbursements)</li> <li>• Cash Processing Scanning Svcs</li> <li>• Pensions Domestic Only</li> </ul>

			<ul style="list-style-type: none"> <li>• Pensions Pennsylvania Only</li> <li>• Stock Based Compensation</li> <li>• Compensation &amp; Benefits</li> <li>• Insurance Services-General</li> <li>• Financial Information Group</li> <li>• Strategic Development Support</li> <li>• Post Retirement / Medical and Life Insurance</li> <li>• Medical/Dental/Life Insurance/Other Insurance</li> <li>• Workers Compensation/Survivors Income Protection</li> <li>• Diversity</li> <li>• Asset Protection</li> <li>• Executive Services</li> <li>• Records Separation</li> <li>• HR-All Empl Services</li> <li>• HR-Salaried Empl Services</li> <li>• Consulting</li> <li>• Acquisition &amp; Departure of Employees</li> <li>• HR-BU Empl Services</li> <li>• HR&amp;S Projects</li> <li>• Implement new systems applications and infrastructure</li> <li>• Manage ISD-Discretionary Costs</li> <li>• Manage ISD-Sustenance Costs</li> <li>• Enhance applications infrastructure and client services</li> <li>• Support for existing systems applications and infrastructure Hardware</li> <li>• Records Separation</li> <li>• Legal Services</li> <li>• Government Affairs &amp; Communications</li> <li>• Records Separation</li> <li>• Annual Meeting/Proxy</li> <li>• Board Services</li> <li>• PPL/EU Corporate Issues</li> <li>• Acquisition-Disposal of Materials and Services</li> <li>• Storage of Goods</li> </ul>
38	Progress Energy Service Company, LLC	On December 31, 2015 Progress Energy Service	<ul style="list-style-type: none"> <li>• No services listed</li> </ul>

		was legally merged into Duke Energy Business Services	
39	SCANA Services, Inc	<ol style="list-style-type: none"> <li>1. South Carolina Electric &amp; Gas Company, Inc.</li> <li>2. South Carolina Fuel Company, Inc.</li> <li>3. Public Service Company of North Carolina Incorporated</li> <li>4. SCANA Energy Marketing, Inc.</li> <li>5. South Carolina Generating Company, Inc.</li> <li>6. SCANA Corporation (Parent Company)</li> </ol>	<ul style="list-style-type: none"> <li>• Information systems technology services</li> <li>• Customer-related billing</li> <li>• Mailing</li> <li>• Remittance processing</li> <li>• Call center and customer communications services for electric and gas customers</li> <li>• Marketing-related services</li> <li>• Gas measurement services and fleet management services</li> <li>• Employee services</li> <li>• Administrative services including procurement</li> <li>• Finance</li> <li>• Accounting</li> <li>• Risk management and public affairs corporate governance services including legal</li> <li>• Investor relations</li> <li>• Shareholder services</li> <li>• Corporate compliance</li> <li>• Corporate secretarial</li> <li>• Strategic planning and certain executive administrative services</li> <li>• Telecommunications services</li> <li>• Gas supply and capacity management services</li> <li>• Gas system management and monitoring services</li> <li>• Gas control coordination and gas engineering services</li> </ul>
40	Southern Company Services, Inc	<ol style="list-style-type: none"> <li>1. The Southern Company</li> <li>2. Alabama Power Company</li> <li>3. Georgia Power Company</li> <li>4. Gulf Power Company</li> <li>5. Mississippi Power Company</li> <li>6. Southern Electric Generating Company</li> <li>7. Southern Nuclear Operating Company</li> </ol>	<ul style="list-style-type: none"> <li>• Accounting</li> <li>• Auditing</li> <li>• Executive and Corporate</li> <li>• External Affairs</li> <li>• Finance</li> <li>• Human Resources</li> <li>• Information Technology</li> <li>• Insurance</li> <li>• Legal and General Counsel</li> <li>• Marketing Services</li> <li>• Supply Chain Management</li> <li>• System Air</li> </ul>

		8. Southern Company Holdings, Inc. 9. Southern Communications Services, Inc. 10. Southern Power Company 11. Southern Company Gas 12. PowerSecure International	<ul style="list-style-type: none"> <li>• Treasury</li> <li>• Information Technology</li> <li>• SCG Exec and Corporate Support</li> <li>• Transmission, Engineering, Environmental and Research</li> <li>• Chief Production Officer</li> </ul>
41	Southern Nuclear Operating Company, Inc	1. Alabama Power Company 2. Georgia Power Company 3. Southern Nuclear Services, LLC 4. Southern Nuclear Development, LLC	<ul style="list-style-type: none"> <li>• No services listed</li> </ul>
42	TECO Services, Inc	1. TECO Energy, Inc. 2. TECO Finance 3. TECO Energy Source 4. TECO Gemstone 5. TECO Pipeline Holding Co 6. SeaCoast Gas Transmission 7. Tampa Electric Co 8. Peoples Gas System 9. TECO Partners 10. New Mexico Gas Company 11. Bridgeport Energy LLC 12. Emera Caribbean Holdings Ltd 13. Emera Caribbean Inc 14. Emera Energy Generation II LLC 15. Emera Energy Inc. 16. Emera Energy US Sub #1 17. Emera Inc. 18. Emera Maine 19. Emera US Holdings Inc 20. Grand Bahama Power Co 21. ICD Utilities Ltd. 22. Nova Scotia Power Inc. 23. Rumford Power Inc 24. Scotia Power US Ltd. 25. Tiverton Power LLC	<ul style="list-style-type: none"> <li>• Accounts Payable</li> <li>• Claim Management</li> <li>• Corporate Communications</li> <li>• Emergency Management</li> <li>• Human Resources</li> <li>• Information Technology</li> <li>• Procurement</li> </ul>

43	Unitil Service Corporation	<ol style="list-style-type: none"> <li>1. Unitil Energy Systems, Inc.</li> <li>2. Fitchburg Gas and Electric Light Company</li> <li>3. UNITIL Realty Corp.</li> <li>4. UNITIL Resources, Inc.</li> <li>5. UNITIL Corp.</li> <li>6. Northern Utilities, Inc</li> <li>7. Granite State Gas Transmission, Inc</li> </ol>	<ul style="list-style-type: none"> <li>• Regulatory Services</li> <li>• Distributed Energy Resources</li> <li>• Human Resources</li> <li>• Administrative Services</li> <li>• Executive</li> <li>• Finance</li> <li>• Information Systems</li> <li>• Accounting</li> <li>• Engineering</li> <li>• Energy Contracts</li> <li>• Financial Services</li> <li>• Business Continuity &amp; Compliance</li> <li>• Customer Service</li> <li>• Distribution Engineering</li> <li>• Communication Services</li> <li>• Gas Engineering</li> <li>• Energy Measurement &amp; Control</li> <li>• Gas Operations</li> <li>• Operations Services</li> <li>• Business Development</li> </ul>
44	WEC Business Services LLC	<ol style="list-style-type: none"> <li>1. Bluewater Gas Storage, LLC</li> <li>2. Bostco LLC</li> <li>3. Elm Road Generating Station Supercritical, LLC</li> <li>4. Integrys Holding, Inc.</li> <li>5. Michigan Gas Utilities Corporation</li> <li>6. Minnesota Energy Resources Corporation</li> <li>7. North Shore Gas Company</li> <li>8. Peoples Energy, LLC</li> <li>9. The Peoples Gas Light and Coke Company</li> <li>10. Upper Michigan Energy Resources Corporation</li> <li>11. WEC Energy Group, Inc.</li> <li>12. W.E. Power, LLC</li> <li>13. Wisconsin Electric Power Company</li> <li>14. Wisconsin Energy Capital Corporation</li> <li>15. Wisconsin Gas LLC</li> <li>16. Wisconsin Public Service Corporation</li> </ol>	<ul style="list-style-type: none"> <li>• Administrative</li> <li>• Communications</li> <li>• Customer Service</li> <li>• Environmental</li> <li>• Executive Management</li> <li>• External Affairs</li> <li>• Finance</li> <li>• Human Resources</li> <li>• Information Technology</li> <li>• Legal and Governance</li> <li>• Supply Chain</li> <li>• Operational Support and Development</li> <li>• Wholesale Energy and Fuels</li> </ul>

		17. Wisconsin Public Service Foundation, Inc. 18. Wisconsin River Power Company 19. Wispark LLC 20. WPS Power Development, LLC	
45	Xcel Energy Services Inc	1. NSP-Minnesota 2. PSCo, SPS 3. NSP-Wisconsin 4. Xcel Energy, Inc. 5. Xcel Energy Joint Ventures 6. e-prime, Inc. 7. Eloigne Company 8. Xcel Energy WYCO, Inc. 9. Capital Services, LLC 10. Nicollet Projects I, LLC 11. Xcel Energy Transmission Development Company, LLC 12. Xcel Energy Transmission Holding Company, LLC 13. NCE Communications, Inc. 14. Xcel Energy Wholesale Group Inc. 15. Xcel Energy Ventures Inc. 16. Chippewa and Flambeau Improvement Company 17. Xcel Energy Southwest Transmission Company, LLC 18. WestGas Interstate, Inc. 19. 1480 Welton, Inc. 20. P.S.R. Investments, Inc. 21. Clearwater Investments, Inc. 22. Xcel Energy Ventures Holdings 23. Xcel Energy Retail Holdings Inc. 24. Xcel Energy Performance Contracting Inc.	<ul style="list-style-type: none"> <li>• Rates &amp; Regulation</li> <li>• Energy Supply Engineering and Environmental</li> <li>• Energy Supply Business Resources</li> <li>• Energy Markets Regulated Trading &amp; Marketing</li> <li>• Energy Markets - Fuel Procurement</li> <li>• Energy Delivery Marketing</li> <li>• Energy Delivery Construction</li> <li>• Operations &amp; Maintenance (COM)</li> <li>• Energy Delivery Engineering/Design</li> <li>• Marketing &amp; Sales</li> <li>• Customer Service</li> <li>• Business Systems</li> <li>• Aviation Services</li> <li>• Facilities Administrative Services</li> <li>• Supply Chain</li> <li>• Supply Chain Special Programs</li> <li>• Human Resources</li> <li>• Finance &amp; Treasury</li> <li>• Accounting</li> <li>• Financial Reporting &amp; Taxes</li> <li>• Payment &amp; Reporting</li> <li>• Receipts Processing</li> <li>• Payroll</li> <li>• Executive Management Services</li> <li>• Investor Relations</li> <li>• Internal Audit</li> <li>• Legal</li> <li>• Claims Services</li> <li>• Corporate Communications</li> <li>• Employee Communications</li> <li>• Corporate Strategy &amp; Business Development</li> <li>• Government Affairs</li> </ul>

		<ul style="list-style-type: none"> <li>25. Xcel Energy West Transmission Company, LLC</li> <li>26. Energy Impact Fund Investments</li> <li>27. Reddy Kilowatt Corporation</li> <li>28. Quixx Corporation</li> <li>29. Xcel Energy Communications Group Inc.</li> <li>30. Xcel Energy International, Inc.</li> <li>31. Xcel Energy Markets Holdings, Inc.</li> <li>32. Nicollet Holdings Company</li> <li>33. Seren Innovations, Inc.</li> <li>34. United Power and Land Company</li> <li>35. NSP Lands, Inc.</li> </ul>	<ul style="list-style-type: none"> <li>• Facilities &amp; Real Estate</li> </ul>
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