

2) Apply the remaining half of the difference between the approved revenue requirement and Ameren’s proposed revenue requirement on an equal percentage basis to all customer classes.

**Q. PLEASE PROVIDE AN ILLUSTRATIVE EXAMPLE.**

A. Commission Staff has proposed a revenue requirement increase of approximately \$221 million in this case, which is a reduction from the Company’s proposed revenue requirement of approximately \$77 million. See Direct Testimony of Lisa M. Ferguson, page 10, line 16. As shown in Exhibit SWC-8 and Table 7, the proposed allocation methodology, at a reduction of \$77 million, provides for rate relief for all customer classes while using the revenue requirement reduction to provide approximately a 41 percent movement towards cost of service-based rates for SGS, LGS, SP, LPS, and Company-Owned Lighting.

**Table 7. Results of MECG Revenue Allocation Proposal, \$77 Million Reduction per Staff Proposed Revenue Requirement.**

Customer Class	Revenue Change		Subsidy Reduction
	(\$)	(%)	(%)
Residential	\$131,951,362	10.4	
Small General Service	\$26,743,055	9.8	41
Large General Service	\$34,010,216	6.7	41
Small Primary Service	\$14,812,832	6.7	41
Large Primary Service	\$12,351,893	6.6	41
Company Owned Lighting	\$1,144,501	3.2	41

Source: Exhibit SWC-8

1 **LGS and SP Rate Design**

2 **Q. WHAT IS YOUR UNDERSTANDING OF THE CHARGES INCLUDED IN THE CURRENT**  
3 **LGS RATE DESIGN?**

4 **A.** My understanding is that the LGS rate design is, in my experience, a relatively  
5 complex rate structure, and composed of the following charges:

- 6 1) Summer and winter customer charges, which are a \$/month charge, the level  
7 of which does not vary by season;
- 8 2) Summer and winter demand charges, which are a \$/kW charge based on  
9 "total billing demand," which is determined as the maximum demand during  
10 the billing period, but no less than 100 kW;
- 11 3) Summer energy charges, which are a set of declining block hours-use \$/kWh  
12 charges based on the customer's load factor for the billing month using the  
13 total billing demand for the month. There are three blocks built into the  
14 energy charges. The break-point for the first block is 150 kWh/kW of billing  
15 demand, and the break-point for the second block is 350 kWh/kW of billing  
16 demand;
- 17 4) Winter energy charges, which are a set of declining block hours-use \$/kWh  
18 charges based on the customer's "base billing demand" for the winter  
19 month, which is the lesser of the total billing demand for the month or the  
20 maximum of the total billing demand for the customer for the preceding  
21 May, June, July, August, September, or October. There are three blocks built

1 into the energy charges. The break-point for the first block is 150 kWh/kW of  
2 base billing demand, and the break-point for the second block is 350  
3 kWh/kW of base billing demand;

4 5) Winter seasonal energy charge, which is a \$/kWh charge applied to energy  
5 usage related to "seasonal billing demand," which is the portion of total  
6 billing demand in excess of base billing demand; and

7 6) Low income pilot program charge, which is a \$/month charge. See MO P.S.C.  
8 Schedule 6, 4<sup>th</sup> Revised, Sheet No. 56.

9 **Q. DOES THE COMPANY DEFINE WHEN THE SUMMER AND WINTER RATES ARE**  
10 **APPLICABLE?**

11 A. Yes. In the tariff, the Company defines summer rates as being applicable during the  
12 four monthly billing periods of June through September, and winter rates as being  
13 applicable during the eight monthly billing periods of October through May. *Id.*

14 **Q. WHAT IS YOUR UNDERSTANDING OF THE STRUCTURE OF THE BASE CHARGES**  
15 **INCLUDED IN THE CURRENT SP RATE DESIGN?**

16 A. My understanding is that the structure of the base charges included in the current  
17 SP rate design are largely identical to those in the current LGS rate design, with the  
18 addition of reactive charges assessed on a \$/kVar basis. Additionally, total billing  
19 demand is determined as the maximum demand during peak hours or 50 percent of  
20 the maximum demand established during off-peak hours, and in no event less than  
21 100 kW. See MO P.S.C. Schedule No. 6, 4<sup>th</sup> Revised, Sheet No. 57.

1       **Q.     WHAT IS YOUR UNDERSTANDING OF HOW THE COMPANY PROPOSES TO APPLY**  
2       **THE REVENUE REQUIREMENT INCREASE TO THE CHARGES CONTAINED IN THE LGS**  
3       **AND SP SCHEDULES?**

4       A.     My understanding is that the Company proposes to apply the proposed revenue  
5       requirement increase to the charges contained in the LGS and SP schedules on an  
6       equal percentage basis, with two exceptions. Due to the rollout of advanced  
7       metering that eliminated the need for incremental metering for Time-of-Day  
8       customers, the Company proposes to equalize the customer charge for SGS, LGS,  
9       SPS, and LPS customers that choose the Time-of-Day option with the customer  
10      charge for non-Time-of-Day customers. Additionally, the Company proposes to set  
11      the monthly customer charge, Rider B credits, and Reactive charge the same for  
12      both SP and LPS. See Direct Thomas of Michael W. Harding, page 11, line 3 to line  
13      19.

14      **Q.     DO THE COMPANY'S EDI BILLS, SUCH AS THOSE RECEIVED BY A CUSTOMER LIKE**  
15      **WALMART, TRANSPARENTLY COMMUNICATE LGS CUSTOMER USAGE AND THE**  
16      **BASE RATE CHARGES ASSESSED?**

17      A.     No. While the Company's EDI bills do provide a line item for each charge detailing  
18      the billing determinants and rate, there is no indication of "base billing demand" or  
19      "seasonal billing demand" on winter bills that are used to assess the seasonal energy  
20      charge on a portion of usage. An example of the impact of this lack of information  
21      on the bill is that, for winter bills, there is no direct method by which a customer



1 could calculate their energy block usages and verify that their billed charges are  
2 correct.

3 **Q. DO YOU PROVIDE AN EXAMPLE OF THE INFORMATION RECEIVED BY A LGS**  
4 **CUSTOMER FROM THE COMPANY THROUGH AN EDI BILL?**

5 A. Yes. Exhibit SWC-9 is the LGS portion of an EDI bill received by Walmart billed on  
6 winter rates<sup>9</sup>.

7 **Q. SHOULD THE COMMISSION REQUIRE AMEREN TO SHOW ALL COMPONENTS OF**  
8 **BILL CALCULATION ON EDI BILLS?**

9 A. Yes.

10 **Q. DOES MECG HAVE CONCERNS WITH THE COMPANY'S RATE DESIGN PROPOSALS**  
11 **FOR THE LGS AND SP CLASSES?**

12 A. Yes. MECG's concerns with the rate design proposals for the LGS and SP classes are:

13 1) LGS and SP rates do not currently reflect the underlying cost of serving those  
14 classes. That is to say that demand charges do not collect all demand-related  
15 costs. Instead a significant portion of these demand-related costs are  
16 collected on a variable basis through the energy charges;

17 2) As a result, LGS and SP rates shift cost responsibility within the rate classes in  
18 that they charge customers for demand-related (i.e., fixed) costs through  
19 energy (i.e., variable) charges; and

---

<sup>9</sup> The remainder of the bill contains natural gas charges, which are not relevant to the instant docket and have been redacted.

1           3) The hours-use energy charge structure is not the most simple and  
2           transparent means to communicate energy and demand price signals and  
3           can unduly discriminate between customers who pursue actions that change  
4           their energy consumption, such as through energy efficiency or conservation.

5       **Q.    WHAT IS YOUR UNDERSTANDING OF THE COST OF SERVICE STUDY RESULTS FOR**  
6       **LGS AND SP?**

7       A.    My understanding is that Ameren incurs three types of costs to serve LGS and SP  
8       customers: Customer, Demand, and Energy. Demand costs are fixed costs incurred  
9       by the Company to size the system such that it can meet the peak kW demands  
10       imposed by the rate class and do not change with changes in how many kWh of  
11       energy are consumed by customers. Customer costs are also fixed costs, which are  
12       incurred based on the number of customers served by the Company, and do not  
13       vary by the size of each customer or how much energy the customers consume.  
14       Given that both the demand and customer costs are fixed, they should not be  
15       collected through a variable energy charge. In contrast, energy costs are variable  
16       costs incurred by the Company in relation to the amount of energy consumed by  
17       customers. In order to send proper price signals, energy charges should only be  
18       used to collect variable costs like fuel.

19       **Q.    ARE THE MAJORITY OF COSTS INCURRED TO SERVE LGS AND SP CUSTOMERS**  
20       **DEMAND-RELATED?**

21       A.    Yes. See Table 8 below. Per Ameren's cost of service study, approximately 77

1 percent of the costs incurred by the Company to serve LGS and SP customers are  
 2 demand-related while only approximately 21 percent are energy related. That said,  
 3 while 77% of costs are demand-related, only 14% of LGS revenues and 9.6% of SP  
 4 revenues are collected through demand costs. Further demonstrating this problem,  
 5 while 20.8% of LGS / SP costs are energy related, 83.6% of LGS revenues and 89.3%  
 6 of SP revenues are collected through energy charges. Clearly then LGS and SP rate  
 7 components are sending incorrect price signals. Specifically, charges for these  
 8 classes suggest to customers that energy costs are higher than they actually are and  
 9 that demand costs are lower than they are.

**Table 8. LGS and SP Cost of Service Study Results, Equalized Rate of Return vs. Proposed LGS and SP Revenue Requirements.**

Component	COSS Results		LGS Revenue Requirement		SP Revenue Requirement	
	(\$000)	(% of Total)	(\$000)	(% of Total)	(\$)	(% of Total)
Demand	\$565,531	76.7	\$79,558	14.0	\$23,625	9.6
Energy	\$153,373	20.8	\$474,667	83.6	\$220,289	89.3
Customer	\$18,762	2.5	\$13,563	2.4	\$2,903	1.2
<b>Total</b>	<b>\$737,666</b>	<b>100</b>	<b>\$562,180</b>	<b>100</b>	<b>\$243,913</b>	<b>100</b>

Source: Exhibit SWC-10

10  
 11 **Q. HOW DOES AMEREN PROPOSE TO COLLECT THE LGS AND SP REVENUE**  
 12 **REQUIREMENTS THROUGH THE PROPOSED RATE DESIGNS?**

13 **A.** Contrary to the results of its cost of service study, Ameren proposes to  
 14 inappropriately collect the majority of LGS and SP revenue requirements through  
 15 the energy charges, as opposed to setting all charges to reflect the underlying cost  
 16 of service study results and assigning customer, demand, and energy costs to their

1           respective charges.

2           **Q.     PLEASE EXPLAIN.**

3           A.     As described above, both the LGS and SP rate schedules utilize three-block “hours-  
4           use” rate structures for the energy charges, which set the billing kWh for each block  
5           based on the kWh used for each kW of billing demand, or load factor for the billing  
6           month. One rate is charged for the first 150 kWh used per kW of billing demand, a  
7           second lower rate is charged for the next 200 kWh used per kW of billing demand,  
8           and all additional kWh are charged the lowest third block rate. As shown in Table 8,  
9           for the LGS class, this proposed rate design would collect approximately 84 percent  
10          of non-energy efficiency base rate revenues through energy charges and  
11          approximately 14 percent of revenues through demand charges. For the SP class,  
12          the proposed rate design would collect approximately 89 percent of non-energy  
13          efficiency base rate revenues through energy charges and approximately 9.6 percent  
14          through demand charges.

15          **Q.     WHICH OF THE COMPANY’S FUNCTIONAL COSTS SHOULD BE RECOVERED**  
16          **THROUGH DEMAND CHARGES?**

17          A.     All of the Company’s production demand (capacity), transmission, and distribution  
18          demand costs should be recovered through demand charges. These costs are fixed  
19          and incurred to serve customer kW demands on the system regardless of how many  
20          kWh are consumed. Optimally the costs for each of the three functions would be  
21          recovered through its own unbundled demand charge (or charges if time or seasonal

1 differentiation is appropriate) to best recover costs in a manner that reflects how  
2 those costs are incurred and allocated.

3 **Q. IS THE COLLECTION OF DEMAND-RELATED COSTS THROUGH AN ENERGY CHARGE**  
4 **CONSISTENT WITH THE COMPANY'S CLASSIFICATION AND ALLOCATION OF**  
5 **DEMAND-RELATED COSTS?**

6 A. No. In its class cost of service study, the Company does not classify or allocate any  
7 of its demand-related costs on an energy basis. Rather, these costs are incurred,  
8 and therefore classified, based on customer demand or number of customers. Costs  
9 should be collected in a manner which reflects how they are incurred. As such,  
10 collecting demand-related (fixed) costs through an energy (variable) charge violates  
11 cost causation principles.

12 **Q. DOES THE RECOVERY OF DEMAND-RELATED COSTS THROUGH AN ENERGY CHARGE**  
13 **DISADVANTAGE HIGHER LOAD FACTOR CUSTOMERS?**

14 A. Yes. The shift in demand-related costs from per kW demand charges to per kWh  
15 energy charges results in a shift in demand cost responsibility from lower load factor  
16 customers to higher load factor customers. This results in a misallocation of cost  
17 responsibility as higher load factor customers overpay for the demand-related costs  
18 incurred by the Company to serve them. In other words, higher load factor  
19 customers are paying for a portion of the demand-related costs that are incurred to  
20 serve the lower load factor customers simply because of the manner in which the  
21 Company collects those costs in rates.

1       **Q.    DO THE COMPANY'S PROPOSED DEMAND CHARGES COVER THE COST OF**  
2       **DISTRIBUTION AND TRANSMISSION SERVICE?**

3       A.    No, they do not. At the Company's proposed revenue requirement, the estimated  
4       year-round cost-based transmission and distribution charge for LGS would be  
5       \$6.05/kW. See Exhibit SWC-13. In comparison, Ameren's proposed total demand  
6       charges are \$6.04/kW for summer months and \$2.24/kW for winter months. See  
7       Exhibit SWC-11.

8       **Q.    WOULD THE PROPER COLLECTION OF DEMAND-RELATED (FIXED) COSTS THROUGH**  
9       **A DEMAND CHARGE PROVIDE BENEFITS TO THE COMPANY?**

10      A.    Yes. By collecting a large percentage of a class revenue requirement through energy  
11      charges, the Company subjects itself to under and overcollection of its revenue  
12      requirement due to fluctuations in customer usage. As such, issues such as weather  
13      and the economy will have a greater impact on the utility versus a rate design in  
14      which an appropriate amount of revenue requirement is collected through the  
15      demand charge.

16      **Q.    DOES THE HOURS-USE RATE STRUCTURE, WITH DECLINING ENERGY RATES AS**  
17      **LOAD FACTOR INCREASES, ADDRESS SOME OF THE SHIFT IN COST RESPONSIBILITY?**

18      A.    Upon examination it does not appear that the hours-use structure addresses the  
19      shift in cost responsibility. On its face, the hours-use structure should benefit higher  
20      load factor customers as the energy rates decline as a customer moves through the

1 declining energy blocks.<sup>10</sup> Additionally, as a customer's load factor increases the  
2 billed cost per kWh can decrease as the customer and demand charge portions of  
3 the bill are spread over more kWh. However, in the face of rate designs that ignore  
4 cost of service study results, these purported benefits are largely illusory.

5 To understand the underlying responsibility for demand costs – that is, which  
6 customers are paying for demand costs incurred by the Company and how much  
7 they are paying for it – it is important to look at the underlying demand cost  
8 recovery on a \$/kW basis – the same basis upon which demand-related costs are  
9 incurred. To do so, the cost of service-based demand and energy charges must be  
10 calculated.

11 **Q. HAVE YOU ESTIMATED A COST OF SERVICE-BASED DEMAND AND ENERGY**  
12 **CHARGES FOR LGS AT THE COMPANY'S PROPOSED REVENUE REQUIREMENT?**

13 **A.** Yes. Assuming the demand charge recovers 76.7 percent of base rate revenues,  
14 consistent with the Company's cost of service study results, the estimated cost of  
15 service-based \$/kW demand charge for LGS for the summer period would be  
16 \$27.42/kW and for the winter period would be \$15.22/kW. Additionally, the cost of  
17 service-based energy charge for the summer period is \$0.02228/kWh and for the  
18 winter period is \$0.01316/kWh. See Exhibit SWC-14.

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<sup>10</sup> It should be noted that hours-use blocks are additive – a customer in a higher block also pays the respective charges for usage in the earlier blocks.

1 Q. WHAT IS THE NEXT REQUIRED CALCULATION?

2 A. The next required calculation is the estimated effective demand cost per kW  
3 charged to customers across a range on monthly load factors or hours of use in a  
4 typical 720-hour month. The estimated effective demand cost is the sum of fixed  
5 costs recovered through the hours-use energy charges plus the demand charge. To  
6 isolate the fixed costs recovered through the hours-use energy charges, I subtracted  
7 the cost of service-based energy charge from the Company's proposed LGS energy  
8 charges for the summer period. For the purposes of the calculation, I assumed that  
9 the customer's load, when operating in any hour, is 500 kW. *Id.*



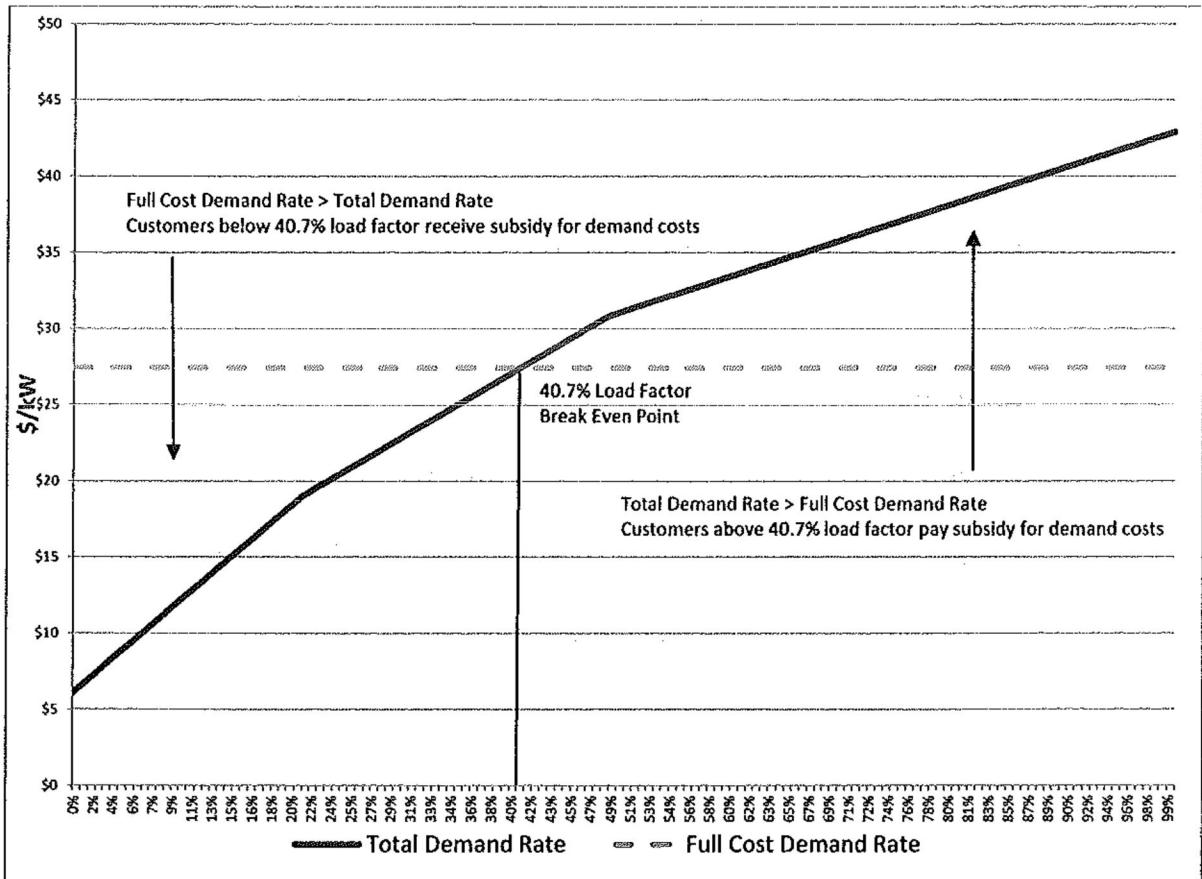


Figure 3. Effective \$/kW Charged to Customers by Load Factor, LGS Summer (720 Hour Month)

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 2  
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 11

Q. WHAT DOES YOUR ANALYSIS SHOW?

A. As calculated in Exhibit SWC-14 and shown in Figure 3, as load factor increases, the cost per kW charged to customers for demand-related costs increases. This result is a concern, as the demand-related cost incurred to serve a customer *does not change* with the customer's load factor, and, like an increase in per kWh energy consumption, an increase in load factor should not result in an increase in the demand-related cost per kW charged to that customer. This design does not reward the more efficient utilization of the Company's facilities and instead just shifts costs

1 responsibility within the customer class. When compared to the cost of service-  
2 based demand charge, a number of customers would not just be effectively charged  
3 a higher rate for demand-related costs, but would be charged a rate that exceeds  
4 the cost of service-based level.

5 **Q. IN YOUR OPINION, IS THE HOURS-USE STRUCTURE THE MOST SIMPLE AND**  
6 **TRANSPARENT MANNER IN WHICH TO COMMUNICATE ENERGY AND DEMAND**  
7 **PRICE SIGNALS?**

8 A. No. The hours-use structure is not the simplest manner as it requires the analyst to  
9 have more than a surface level understanding of the rate structure in order to  
10 understand the interplay of the energy rates and load factor, which is needed to  
11 perform bill analyses.

12 **Q. HAVE YOU CREATED AN ILLUSTRATIVE BILL ANALYSIS OF LGS RATES TO**  
13 **DEMONSTRATE THIS COMPLEXITY ?**

14 A. Yes, as shown in Exhibit SWC-15, which demonstrates a bill analysis for a summer  
15 month, and Exhibit SWC-16, which demonstrates a bill analysis for a winter month.

16 **Q. DOES A BILL ANALYSIS OF LGS RATES REQUIRE SEVERAL STEPS SIMPLY TO**  
17 **DETERMINE WHAT KW DEMAND AND KWH USAGES ARE USED TO CALCULATE**  
18 **COST?**

19 A. Yes. As shown in Exhibit SWC-15, for summer months, identifying the kW demand is  
20 straightforward, but calculating the kWh to be used in each of the three blocks  
21 requires three sets of calculations.

1       **Q.    IS THE DETERMINATION OF THE KW DEMAND AND KWH USAGES USED TO**  
2       **CALCULATE COST IN WINTER MONTHS EVEN MORE COMPLEX?**

3       A.    Yes.  As shown in Exhibit SWC-16, determining the applicable kW demands for  
4       winter bills requires analyzing the billing demands from the previous May, October,  
5       and summer month with the highest demand, in addition to the billing period kW, to  
6       determine the lowest of the four demands.  That amount is then compared to the  
7       billing period kW to determine the seasonal demand and seasonal energy, and those  
8       amounts then inform the kW demand and kWh energy amounts to be processed  
9       through the blocking exercise.  As noted above, winter bills do not include the  
10      additional demands, so validation of the analysis is extremely difficult.

11      **Q.    CAN THE HOURS-USE STRUCTURE UNDULY DISCRIMINATE BETWEEN CUSTOMERS**  
12      **WHO INSTALL ENERGY EFFICIENCY MEASURES?**

13      A.    Yes, and this can be shown with a simple example.  Assume two customers have the  
14      same monthly billing demand.  One of the customers has a load factor of 40 percent  
15      and the other has a load factor of 70 percent.  Both customers install the same  
16      energy efficiency measure that operates in the same manner and at the same time  
17      for both customers, and that measure has no effect on the monthly billing demand.  
18      Using Ameren's proposed LGS summer rates, the customer with the 40 percent load  
19      factor will save 8.16 cents/kWh while the customer with the 70 percent load factor  
20      will save only 5.49 cents/kWh, even though the energy efficiency measure for each  
21      had the same impact on customer usage and the utility's system.  It should also be

1 noted that some of the incremental amount of savings is attributable to demand-  
2 related costs collected through the energy charges, even though the customer did  
3 not actually reduce demand on the system. This is neither a cost-based nor  
4 equitable result.

5 **Q. IS AMEREN CURRENTLY DEPLOYING AMI?**

6 A. Yes. See Direct Testimony of Warren Wood, page 5, line 8 to line 11.

7 **Q. HAS THE COMPANY IN THE PAST DELINEATED THE BENEFITS OF AMI AS IT RELATES**  
8 **TO RATES?**

9 A. Yes. In ER-2019-0335, the Company presented the following benefits of AMI as it  
10 relates to rates:

- 11 1) AMI meters facilitate the Company's ability to bill more complex rates;
- 12 2) AMI data can facilitate analysis of the impact that adoption of different rate  
13 structures has on customer bills, enabling more informed customer decision-  
14 making about the best rate options;
- 15 3) AMI data allows the Company to present customers with more detailed and  
16 timely usage information and provide insights regarding new and different  
17 ways that customers can change usage to manage their bills and respond to  
18 price signals; and
- 19 4) Smart devices could potentially leverage price or other signals to automate  
20 load shifting to benefit the utility system or reduce customer bills. See File  
21 No. ER-2019-0335, Direct Testimony of Steven M. Wills, page 11, line 9 to

1 page 12, line 3.

2 **Q. DOES MECG GENERALLY AGREE WITH THE COMPANY'S STATED BENEFITS?**

3 A. Yes. However, rate designs not based on the utility's cost of service, such as the  
4 hours-use rate designs featured in Ameren's current and proposed LGS and SP rate  
5 designs, do not best leverage AMI technology, which, with usage visibility, can allow  
6 for transparent, cost-based, and actionable time of use rate options. The benefits of  
7 AMI are far less likely to be realized by LGS and SP customers without a complete  
8 restructuring of those rate schedules.

9 **Q. IN ER-2019-0335, DID THE COMPANY SPECIFY A PREFERRED RATE STRUCTURE AS**  
10 **PART OF ITS ANALYSIS OF MODERN RATE STRUCTURES?**

11 A. Yes. The Company stated that the three-part rate with demand charge, which is  
12 defined as "a three part rate with a customer, demand, and time varying energy  
13 charge," is the top candidate based on the criteria of being grounded in cost of  
14 service analysis and performing well in respect to the promotion of equity and  
15 efficiency. In fact, the Company stated that the three part rate with demand charge  
16 "is significantly better than any other rate." *Id.*, page 5, line 6 to page 6, line 16.

17 **Q. DID MECG AGREE IN THAT CASE WITH THE COMPANY'S ASSESSMENT OF THE**  
18 **THREE PART RATE WITH DEMAND CHARGE?**

19 A. Yes. The Company's three part rate with demand charge concept, particularly with  
20 the inclusion of time varying energy rates, can be easily implemented in a cost-based  
21 manner, is fundamentally sound, and leads to transparent, understandable, and

1           actionable rates.

2           **Q.    IN THIS CASE DOES THE COMPANY DISCUSS TRANSITIONING TO NEW RATE**  
3           **STRUCTURES AS PART OF THE AMI DEPLOYMENT?**

4           A.    Yes, however the Company focuses on residential rates.  See Direct Testimony of  
5           Steven M. Wills, page 3, line 11 to line 21.  Interestingly, the Company's Ultimate  
6           Savers proposal, which incorporates a demand charge for residential customers,  
7           proposes to price that demand charge at \$7.03/kW, which is 16 percent higher than  
8           the proposed LGS summer demand charge and 213 percent higher than the  
9           proposed LGS winter demand charge.  See Direct Testimony of Ahmad Faruqui,  
10          Ph.D., page 7, line 8.

11          **Q.    IN RECOGNITION OF THE BENEFITS TO CUSTOMERS OF AMI, SHOULD THE**  
12          **COMMISSION REQUIRE A TRANSITION AWAY FROM HOURS-USE RATES AS PART**  
13          **OF THIS CASE?**

14          A.    Yes.  The Commission should require Ameren to redesign LGS and SP as three part  
15          rates with unbundled demand charges and time varying energy charges and for all  
16          LGS and SP customers to be transitioned to those rates by 2025, which is my  
17          understanding of when the Company anticipates AMI will be fully deployed.  
18          However, it is important to make changes now to move LGS and SP rates closer to  
19          cost of service levels.

1       **Q.     WHAT IS MECG’S RECOMMENDATION TO THE COMMISSION AT THE COMPANY’S**  
2       **PROPOSED REVENUE REQUIREMENTS FOR THE LGS AND SP CLASSES?**

3       A.     For the purposes of this docket, at the Company’s proposed revenue requirement  
4       for the LGS and SP classes, MECG recommends that the Commission:

- 5             1) Accept Ameren’s proposed customer charges and on-peak and off-peak  
6             adjusters for both LGS and SP, and Ameren’s proposed Rider B credits and  
7             reactive charge for SP;  
8             2) Increase the summer and winter demand charges for LGS and SP by three  
9             times the percent class increases; and  
10            3) Apply the remaining proposed increase on an equal percentage basis to the  
11            summer and winter energy charges.

12       **Q.     HAVE YOU CALCULATED ILLUSTRATIVE RATES FOR LGS PER MECG’S PROPOSAL?**

13       A.     Yes, as shown in Exhibit SWC-17.

14       **Q.     WHAT IS MECG’S RECOMMENDATION TO THE COMMISSION IF THE COMMISSION**  
15       **APPROVES A LOWER LGS AND SP CLASS REVENUE REQUIREMENT THAN THAT**  
16       **PROPOSED BY THE COMPANY?**

17       A.     If the Commission awards an increase for these classes that is lower than that  
18       proposed by the Company, then the Commission can then take larger steps to  
19       address the over-recovery of demand-related costs through energy charges and  
20       associated intra-class subsidies. Specifically, the Commission should set the demand  
21       charges per MECG’s recommendation above and apply the approved reduction in

1 the class revenue requirement by reducing all base rate energy charges on an equal  
2 percentage basis.

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

4 **A. Yes.**



# Steve W. Chriss

Walmart Inc.  
Business Address: 2608 SE J Street, Bentonville, AR, 72716

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## EXPERIENCE

July 2007 – Present

Walmart Inc., Bentonville, AR

Director, Energy Services (October 2018 – Present)

Director, Energy and Strategy Analysis (October 2016 – October 2018)

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

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

June 2003 – July 2007

Public Utility Commission of Oregon, Salem, OR

Senior Utility Analyst (February 2006 – July 2007)

Economist (June 2003 – February 2006)

January 2003 - May 2003

North Harris College, Houston, TX

Adjunct Instructor, Microeconomics

June 2001 - March 2003

Econ One Research, Inc., Houston, TX

Senior Analyst (October 2002 – March 2003)

Analyst (June 2001 – October 2002)

## EDUCATION

2001	Louisiana State University	M.S., Agricultural Economics
1997-1998	University of Florida	Graduate Coursework, Agricultural Education and Communication
1997	Texas A&M University	B.S., Agricultural Development B.S., Horticulture

## PRESENT MEMBERSHIPS

Arizona Independent Scheduling Administrators Association, Board

Arizonans for Electric Choice & Competition, Chairman

Arkansas Advanced Energy Foundation, Board

Edison Electric Institute National Key Accounts Program, Customer Advisory Group

Florida Advisory Council for Climate and Energy

Renewable Energy Buyers Alliance, Advisory Board

## PAST MEMBERSHIPS

Southwest Power Pool, Corporate Governance Committee, 2019

## TESTIMONY BEFORE REGULATORY COMMISSIONS

2021

Florida Docket No. 20210015-EI: In re: Petition for Rate Increase by Florida Power & Light Company.

California Docket No. R-20-08-020: Order Instituting Rulemaking to Revisit Net Energy Metering Tariffs Pursuant to Decision 16-01-044, and to Address Other Issues Related to Net Energy Metering.

**The Midwest Energy Users Group  
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Missouri File No. ER-2021-0240**

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

North Dakota Case No. PU-20-441: In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in North Dakota.

New Mexico Case No. 20-00222-UT: In the Matter of the Joint Application of Avangrid, Inc., Avangrid Networks, Inc., NM Green Holdings, Inc., Public Service Company of New Mexico and PNM Resources, Inc. For Approval of the Merger of NM Green Holdings, Inc. with PNM Resources, Inc.; Approval of a General Diversification Plan; and All Other Authorizations and Approvals Requires to Consummate and Implement this Transaction.

**2020**

Arizona Docket No. E-01345A-19-0236: In the Matter of the Application of Arizona Public Service Company for a Hearing to Determine the Fair Value of Ratemaking Purposes, to Fix a Just and Reasonable Return Thereon and to Approve Rate Schedules Designed to Develop Such Return.

Florida Docket No. 20200176-EI: In re: Petition by Duke Energy Florida, LLC for a Limited Proceeding to Approve Clean Energy Connection Program and Tariff and Stipulation.

Florida Docket No. 20200092-EI: In re: Storm Protection Plan Cost Recovery Clause.

Nevada Docket No. 20-05003: Application of Nevada Power Company d/b/a NV Energy Filed Under Advice Letter No. 504 to Establish Customer Price Stability Tariff Schedule No. CPST (the "Program") to Assist Certain Qualifying Customers During the COVID-19 Pandemic and Economic Downturn, and to Address Certain Customer Requests for Price Stability and Potential Cost Savings in Meeting Customer Specific Business Needs and Sustainability Objectives.

Nevada Docket No. 20-05004: Application of Sierra Pacific Power Company d/b/a NV Energy Filed Under Advice Letter No. 629-E to Establish Customer Price Stability Tariff Schedule No. CPST (the "Program") to Assist Certain Qualifying Customers During the COVID-19 Pandemic and Economic Downturn, and to Address Certain Customer Requests for Price Stability and Potential Cost Savings in Meeting Customer Specific Business Needs and Sustainability Objectives.

Utah Docket No. 20-035-04: Application of Rocky Mountain Power for the Authority to Increase its Retail Electric Utility Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations.

Wyoming Docket No. 20000-578-ER-20: In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Service Rates by Approximately \$7.1 Million Per Year or 1.1 Percent, to Revise the Energy Cost Adjustment Mechanism, and to Discontinue Operations at Cholla Unit 4.

Virginia Case No. PUR-2020-00015: Application of Appalachian Power Company for a 2020 Triennial Review of the Rates, Terms and Conditions for the Provision of Generation, Distribution and Transmission Services Pursuant to §56-585.1 A of the Code of Virginia.

Oregon Docket No. UE 374: In the Matter of PacifiCorp d/b/a Pacific Power Request for a General Rate Revision.

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Missouri File No. ER-2021-0240**

Florida Docket No. 20200067-El: In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company.

Florida Docket No. 20200069-El: In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC.

Florida Docket No. 20200070-El: In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Gulf Power Company.

Florida Docket No. 20200071-El: In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company.

North Carolina Docket No. E-2, Sub 1219: Application of Duke Energy Progress, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Missouri Case No. ER-2019-0374: In the Matter of the Empire District Electric Company's Request for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in its Missouri Service Area.

North Carolina Docket No. E-7, Sub 1214: In the Matter of Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Texas Docket No. 49831: Application of Southwestern Public Service Company for Authority to Change Rates.

**2019**

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

Michigan Case No. U-20561: In the Matter of the Application of DTE Electric Company for Authority to Increase its Rates, Amend its Rate Schedules and Rules Governing the Distribution and Supply of Electric Energy, and for Miscellaneous Accounting Authority.

Indiana Cause No. 45253: Petition of Duke Energy Indiana, LLC Pursuant to Ind. Code §§ 8-1-2-42.7 and 8-1-2-61, For (1) Authority to Modify its Rates and Charges for Electric Utility Service Through a Step-In of New Rates and Charges Using a Forecasted Test Period; (2) Approval of New Schedules of Rates and Charges, General Rules and Regulations, and Riders; (3) Approval of a Federal Mandate Certificate Under Ind. Code § 8-1-8.4-1; (4) Approval of Revised Electric Depreciation Rates Applicable to its Electric Plant in Service; (5) Approval of Necessary and Appropriate Accounting Deferral Relief; and (6) Approval of a Revenue Decoupling Mechanism for Certain Customer Classes.

Arizona Docket No. E-01933A-19-0228: In the Matter of the Application of Tucson Electric Power Company for the Establishment of Just and Reasonable Rates and Charges Designed to Realize a Reasonable Rate of Return on the Fair Value of the Properties of Tucson Electric Power Company Devoted to its Operations Throughout the State of Arizona and for Related Approvals.

Georgia Docket No. 42516: In Re: Georgia Power's 2019 Rate Case.

Colorado Proceeding No. 19AL-0268E: Re: In the Matter of Advice No. 1797-Electric of Public Service Company of Colorado to Revise its Colorado P.U.C. No. 8-Electric Tariff to Implement Rate Changes Effective on Thirty Days' Notice.

New York Case No. 19-E-0378: Proceeding on the Motion of the Commission as to the Rates, Charges, Rules, and Regulations of New York State Electric & Gas Corporation for Electric Service.

New York Case No. 19-E-0380: Proceeding on the Motion of the Commission as to the Rates, Charges, Rules, and Regulations of Rochester Gas & Electric Corporation for Electric Service.

Maryland Case No. 9610: In the Matter of the Application of Baltimore Gas and Electric Company for Adjustments to its Electric and Gas Base Rates.

Nevada Docket No. 19-06002: In the Matter of the Application by Sierra Pacific Power Company, D/B/A NV Energy, Filed Pursuant to NRS 704.110(3) and NRS 704.110(4), Addressing its Annual Revenue Requirement for General Rates Charged to All Classes of Electric Customers.

Florida Docket No. 20190061-EI: In Re: Petition of Florida Power & Light Company for Approval of FPL SolarTogether Program and Tariff.

Wisconsin Docket No. 6690-UR-126: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates – Test Year 2020.

Wisconsin Docket No. 5-UR-109: Joint Application of Wisconsin Electric Power Company and Wisconsin Gas LLC for Authority to Adjust Electric, Natural Gas, and Steam Rates – Test Year 2020.

New Mexico Case No. 19-00158-UT: In the Matter of the Application of Public Service Company of New Mexico for Approval of PNM Solar Direct Voluntary Renewable Energy Program, Power Purchase Agreement, and Advice Notice Nos. 560 and 561.

Indiana Cause No. 45235: Petition of Indiana Michigan Power Company, and Indiana Corporation, for Authority to Increase its Rates and Charges for Electric Utility Service through a Phase In Rate Adjustment; and for Approval of Related Relief Including: (1) Revised Depreciation Rates; (2) Accounting Relief; (3) Inclusion in Rate Base of Qualified Pollution Control Property and Clean Energy Project; (4) Enhancements to the Dry Sorbent Injection System; (5) Advanced Metering Infrastructure; (6) Rate Adjustment Mechanism Proposals; and (7) New Schedules of Rates, Rules and Regulations.

Iowa Docket No. RPU-2019-0001: In Re: Interstate Power and Light Company.

Texas Docket No. 49494: Application of AEP Texas Inc. for Authority to Change Rates.

Arkansas Docket No. 19-008-U: In the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Virginia Case No. PUR-2019-00050: Application of Virginia Electric and Power Company for Determination of the Fair Rate of Return on Common Equity Pursuant to § 56-585.1:1 of the Code of Virginia.

Indiana Docket No. 45159: Petition of Northern Indiana Public Service Company LLC Pursuant to Indiana Code §§ 8-1-2-42.7, 8-1-2-61 and Indiana Code §§ 1-2.5-6 for (1) Authority to Modify its Rates and Charges for Electric Utility Service Through a Phase In of Rates; (2) Approval of New Schedules of Rates and Charges, General Rules and Regulations, and Riders; (3) Approval of Revised Common and Electric Depreciation Rates Applicable to its Electric Plant in Service; (4) Approval of Necessary and Appropriate Accounting Relief; and (5) Approval of a New Service Structure for Industrial Rates.

Texas Docket No. 49421: Application of Centerpoint Energy Houston Electric, LLC for Authority to Change Rates.

Nevada Docket No. 18-11015: Re: Application of Nevada Power Company d/b/a NV Energy, Filed Under Advice No. 491, to Implement NV Greenenergy 2.0 Rider Schedule No. NGR 2.0 to Allow Eligible

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Missouri File No. ER-2021-0240**

Commercial Bundled Service Customers to Voluntarily Contract with the Utility to Increase Their Use of Reliance on Renewable Energy at Current Market-Based Fixed Prices.

Nevada Docket No. 18-11016: Re: Application of Sierra Pacific Power Company d/b/a NV Energy, Filed Under Advice No. 614-E, to Implement NV Greenenergy 2.0 Rider Schedule No. NGR 2.0 to Allow Eligible Commercial Bundled Service Customers to Voluntarily Contract with the Utility to Increase Their Use of Reliance on Renewable Energy at Current Market-Based Fixed Prices.

Georgia Docket No. 42310: In Re: Georgia Power Company's 2019 Integrated Resource Plan and Application for Certification of Capacity From Plant Scherer Unit 3 and Plant Goat Rock Units 9-12 and Application for Decertification of Plant Hammond Units 1-4, Plant McIntosh Unit 1, Plant Langdale Units 5-6, Plant Riverview Units 1-2, and Plant Estatoah Unit 1.

Wyoming Docket Nos. 20003-177-ET-18: In the Matter of the Application of Cheyenne Light, Fuel and Power Company D/B/A Black Hills Energy For Approval to Implement a Renewable Ready Service Tariff.

South Carolina Docket No. 2018-318-E: In the Matter of the Application of Duke Energy Progress, LLC For Adjustments in Electric Rate Schedules and Tariffs.

Montana Docket No. D2018.2.12: Application for Authority to Increase Retail Electric Utility Service Rates and for Approval of Electric Service Schedules and Rules and Allocated Cost of Service and Rate Design.

Louisiana Docket No. U-35019: In Re: Application of Entergy Louisiana, LLC for Authorization to Make Available Experimental Renewable Option and Rate Schedule ERO.

Arkansas Docket No. 18-037-TF: In the Matter of the Petition of Entergy Arkansas, Inc. For Its Solar Energy Purchase Option.

**2018**

South Carolina Docket No. 2017-370-E: Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for Review and Approval of a Proposed Business Combination Between SCANA Corporation and Dominion Energy, Inc., as may be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans.

Kansas Docket No. 18-KCPE-480-RTS: In the Matter of the Application of Kansas City Power & Light Company to Make Certain Changes in its Charges for Electric Service.

Virginia Case No. PUR-2017-00173: Petition of Wal-Mart Stores East, LP and Sam's East, Inc. for Permission to Aggregate or Combine Demands of Two or More Individual Nonresidential Retail Customers of Electric Energy Pursuant to § 56-577 A 4 of the Code of Virginia.

Virginia Case No. PUR-2017-00174: Petition of Wal-Mart Stores East, LP and Sam's East, Inc. for Permission to Aggregate or Combine Demands of Two or More Individual Nonresidential Retail Customers of Electric Energy Pursuant to § 56-577 A 4 of the Code of Virginia.

Oregon Docket No. UM 1953: In the Matter of Portland General Electric Company, Investigation into Proposed Green Tariff.

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

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Missouri Docket No. ER-2018-0145: In the Matter of Kansas City Power & Light Company's Request for Authority to Implement a General Rate Increase for Electric Service.

Missouri Docket No. ER-2018-0146: In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement a General Rate Increase for Electric Service.

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

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

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

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

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

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

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

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

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

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

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

**2017**

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

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

Oklahoma Cause No. PUD 201700267: Application of Public Service Company of Oklahoma for Approval of the Cost Recovery of the Wind Catcher Energy Connection Project; A Determination There is Need for the Project; Approval for Future Inclusion in Base Rates Cost Recovery of Prudent Costs Incurred by PSO for

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Missouri File No. ER-2021-0240**

the Project; Approval of a Temporary Cost Recovery Rider; Approval of Certain Accounting Procedures Regarding Federal Production Tax Credits; Waiver of OAC 165:35-38-5(E); And Such Other Relief the Commission Deems PSO is Entitled.

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

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

Oklahoma Cause No. PUD 201700151: Application of Public Service Company of Oklahoma, an Oklahoma Corporation, for an Adjustment in its Rates and Charges and the Electric Service Rules, Regulations and Conditions of Service for Electric Service in the State of Oklahoma.

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

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

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

New Jersey Docket No. ER17030308: In the Matter of the Petition of Atlantic City Electric Company for Approval of Amendments to its Tariff to Provide for an Increase in Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1, for Approval of a Grid Resiliency Initiative and Cost Recovery Related Thereto, and for Other Appropriate Relief.

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

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

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

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

Ohio Case No. 16-1852-EL-SSO: In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to §4928.143, Ohio Rev. Code, In the Form of an Electric Security Plan.

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

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



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**Missouri File No. ER-2021-0240**

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

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

**2016**

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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Missouri File No. ER-2021-0240**

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

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

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

*2015*

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

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

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

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

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

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

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

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

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

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

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