

**BEFORE THE ILLINOIS COMMERCE COMMISSION
STATE OF ILLINOIS**

AMEREN ILLINOIS COMPANY)	
Proposed general increase in electric)	Docket No. 11-0279
delivery service rates.)	
)	(cons.)
)	
AMEREN ILLINOIS COMPANY)	
Proposed general increase in gas delivery)	Docket No. 11-0282
service rates.)	

**DIRECT TESTIMONY
OF
STEVE W. CHRISS**

On Behalf of the Commercial Group

June 29, 2011

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

2 A. My name is Steve W. Chriss. My business address is 2001 SE 10th St., Bentonville, AR
3 72716-0550. I am Senior Manager, Energy Regulatory Analysis, for Wal-Mart Stores,
4 Inc.

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

6 A. I am testifying on behalf of The Commercial Group, an ad hoc group of commercial
7 customers of Ameren Illinois Company d/b/a Ameren Illinois (“AIC” or “the Company”).
8 In this proceeding, the Commercial Group is composed of Best Buy Co., Inc., J.C.
9 Penney Corporation, Inc., Macy’s, Inc., Sam’s West, Inc., and Wal-Mart Stores, Inc.

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

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

21 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE**
22 **ILLINOIS COMMERCE COMMISSION (“ICC” OR “COMMISSION”)?**

23 A. No.

24 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER**
25 **STATE REGULATORY COMMISSIONS?**

26 A. Yes. I have submitted testimony before utility regulatory commissions in Arkansas,
27 Colorado, Connecticut, Delaware, Georgia, Indiana, Kentucky, Louisiana, Maryland,
28 Michigan, Minnesota, Mississippi, Missouri, Nevada, New Mexico, Ohio, Oklahoma,
29 Oregon, South Carolina, Texas, Virginia, Washington, and West Virginia and a
30 legislative committee in Missouri. My testimony has addressed topics including cost of
31 service and rate design, qualifying facility rates, telecommunications deregulation,
32 resource certification, energy efficiency/demand side management, fuel cost adjustment
33 mechanisms, decoupling, and the collection of cash earnings on construction work in
34 progress.

35 **Q. HAVE YOU PREPARED ANY EXHIBIT?**

36 A. Yes. I have prepared CG Exhibit 1.1, consisting of two pages.

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

38 A. The purpose of my testimony is address the proposed revenue allocation of AIC.
39 Specifically, I respond to the testimony of Company witnesses Leonard M. Jones and
40 Ryan K. Schonhoff. My recommendations are as follows:

- 41 1) The Commercial Group does not take a position on the Company's proposed cost
42 of service model at this time, and to the extent that alternative cost of service
43 models are proposed by other parties, the Commercial Group reserves the right to
44 address any such models in rebuttal testimony;
- 45 2) At the Company's proposed revenue requirement, the Commercial Group does
46 not oppose the Company's proposed class revenue allocation; and

47 3) If the Commission determines that the appropriate level of revenue requirement is
48 lower than the level proposed by the Company, the Commission should ensure
49 that significant movement towards cost of service remains the goal of the final
50 revenue allocation and determine the extent to which rates can be moved closer to
51 the cost of service for each rate class.

52 The fact that an issue is not addressed should not be construed as an endorsement
53 of any filed position.

54 **Q. GENERALLY, WHAT IS THE COMMERCIAL GROUP'S POSITION ON**
55 **SETTING RATES BASED ON THE UTILITY'S COST OF SERVICE?**

56 A. The Commercial Group advocates that rates be set based on the utility's cost of service.
57 This produces equitable rates that reflect cost causation, send proper price signals, and
58 minimize price distortions.

59 **Q. DOES THE COMMERCIAL GROUP TAKE A POSITION ON THE**
60 **COMPANY'S PROPOSED COST OF SERVICE MODEL ("ECOSS") AT THIS**
61 **TIME?**

62 A. No. However, to the extent that alternative cost of service models, or changes to the
63 Company's ECOSS, are proposed by other parties, the Commercial Group reserves the
64 right to address any such models or changes in rebuttal testimony.

65 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY'S BASE RATE**
66 **REVENUE ALLOCATION PROPOSAL?**

67 A. My understanding of the Company's revenue allocation proposal is that AIC would move
68 towards cost of service-based rates – that is, base rates that recover the revenue

69 requirement for each delivery service class assuming an equalized rate of return for each
70 class. *See* Direct Testimony of Leonard M. Jones, page 10, line 229 to line 232.

71 **Q. DO PRESENT RATES FOR THE TEST YEAR, AS PRESENTED IN THE**
72 **COMPANY’S ECOSS, REFLECT AN EQUALIZED RATE OF RETURN FOR**
73 **EACH RATE CLASS?**

74 A. No. The present rates for the test year from the ECOSS show that the rates of return for
75 the customer classes differ, in some cases very significantly, from what they would be at
76 an equalized rate of return. In fact, all the DS-3 subclasses have rates of returns at least
77 40 percent higher than the total Company rate of return of 7.82 percent. *See* CG Exhibit
78 1.1, page 1.

79 **Q. CAN YOU PROVIDE AN EXAMPLE OF THE IMPACT OF THIS VARIANCE**
80 **ON A RATE CLASS OR SUBCLASS?**

81 A. Yes. When comparing the present rate of return for DS-3 General Primary in the ECOSS
82 to the present total company rate of return, DS-3 General Primary is over-earning, and,
83 by extension, over-collecting from customers in that class, by over \$6 million, or 7.2
84 percent of the DS-3 Primary revenue requirement. *See* CG Exhibit 1.1, page 2.

85 **Q. AT THE COMPANY’S PROPOSED REVENUE REQUIREMENT, WHAT**
86 **CLASS REVENUE CHANGE WOULD BE REQUIRED TO SET TOTAL DS-3**
87 **CLASS RATES AT COST?**

88 A. Based on the Company’s ECOSS, the equalized rate of return base rate change for the
89 total DS-3 class (i.e. “at-cost” rates), at the Company’s proposed revenue requirement,
90 would be a rate reduction of \$4.89 million. *See* Ameren Exhibit 13.4E, p. 1.

91 **Q. DOES THE COMPANY’S PROPOSED REVENUE ALLOCATION MOVE ALL**
92 **CLASSES TO COST OF SERVICE?**

93 A. No. The Company has constrained movement by implementing a bill impact mitigation
94 cap of 1.5 times the average increase for any individual rate class, including the impact of
95 the proposed distribution tax rate change, which I will discuss below. As the Company’s
96 proposed overall increase is 7.24 percent, the proposed cap is 10.87 percent. *See* Direct
97 Testimony of Leonard M. Jones, page 12, line 250 to line 259. Additionally, the
98 Company has implemented a constraint of 1.25 times the class average for intra-class
99 revenue allocation. *Id.*, line 264 to line 267.

100 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY’S REASON FOR**
101 **IMPLEMENTING A BILL IMPACT MITIGATION MECHANISM?**

102 A. My understanding is that the Company wishes to gradually move rates to cost of service
103 and avoid “undue” bill impacts. *Id.*, page 9, line 195 to line 201.

104 **Q. WHAT IS YOUR UNDERSTANDING OF THE COMPANY’S DISTRIBUTION**
105 **TAX RATE SITUATION?**

106 A. My understanding is that due to the merger of the legacy Ameren utilities, the Company
107 faces a single distribution tax per the schedule set out in 35 ILCS 620/2a.1 versus
108 separate taxes for each legacy utility. *Id.*, page 16, line 349 to line 354. The Company is
109 proposing to equalize the distribution tax rate charge for all rate classes and all rate zones
110 in a three-step annual process that would conclude in February, 2014, when all customers
111 would pay the same distribution tax rate. *Id.*, page 19, line 411 to page 20, line 437.

112 **Q. IS THE DISTRIBUTION TAX CONSIDERED PART OF THE DELIVERY**
113 **SERVICE TEST YEAR REVENUE REQUIREMENTS?**

114 A. No. However, when applying the bill impact mitigation cap, the Company has proposed
115 to include the impacts of the changes in the distribution tax rates. *See Ameren Exhibit*
116 *13.4E.*

117 **Q. FOR THE PURPOSES OF THIS DOCKET, AT THE COMPANY'S PROPOSED**
118 **REVENUE REQUIREMENT, DOES THE COMMERCIAL GROUP OBJECT TO**
119 **THE COMPANY'S PROPOSED CLASS REVENUE ALLOCATION?**

120 A. No.

121 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION IF IT**
122 **DETERMINES THAT A LOWER LEVEL OF REVENUE REQUIREMENT IS**
123 **APPROPRIATE?**

124 A. If the Commission determines that the appropriate level of revenue requirement is lower
125 than the level proposed by the Company, the Commission should ensure that significant
126 movement towards cost of service remains the goal of the final revenue allocation and
127 determine the extent to which rates can be moved closer to the cost of service for each
128 rate class.

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

130 A. Yes.

Appendix A

Steve W. Chriss
Senior Manager, Energy Regulatory Analysis
Wal-Mart Stores, Inc.
Business Address: 2001 SE 10th Street, Bentonville, AR, 72716-0550
Business Phone: (479) 204-1594

EXPERIENCE

July 2007 – Present

Wal-Mart Stores, Inc., Bentonville, AR

Senior Manager, Energy Regulatory Analysis (June 2011 – Present)

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

TESTIMONY

2011

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

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

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

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

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

Regarding Missouri Senate Bills 50, 321, 359, and 406: Testimony Before the Missouri Senate Veterans' Affairs, Emerging Issues, Pensions, and Urban Affairs Committee, March 9, 2011.

2010

In the Matter of the Application of Duke Energy Ohio for Approval of a Market Rate Offer to Conduct a Competitive Bidding Process for Standard Service Offer Electric Generation Supply, Accounting Modifications, and Tariffs for Generation Service.

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

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

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

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

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

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

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

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

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

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

Indiana Utility Regulatory Commission Cause No. 43374: Verified Petition of Duke Energy Indiana, Inc. Requesting the Indiana Utility Regulatory Commission to Approve an Alternative Regulatory Plan Pursuant to Ind. Code § 8-1-2.5-1, *ET SEQ.*, for the Offering of Energy Efficiency Conservation, Demand Response, and Demand-Side Management Programs and Associated Rate Treatment Including Incentives Pursuant to a Revised Standard Contract Rider No. 66 in Accordance with Ind. Code §§ 8-1-2.5-1 *ET*

SEQ. and 8-1-2-42 (a); Authority to Defer Program Costs Associated with its Energy Efficiency Portfolio of Programs; Authority to Implement New and Enhanced Energy Efficiency Programs, Including the Powershare® Program in its Energy Efficiency Portfolio of Programs; and Approval of a Modification of the Fuel Adjustment Clause Earnings and Expense Tests.

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

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

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

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

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

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

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

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

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

2009

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

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

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

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

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

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

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

New Mexico Public Regulation Commission Case No. 08-00024-UT: In the Matter of a Rulemaking to Revise NMPRC Rule 17.7.2 NMAC to Implement the Efficient Use of Energy Act.
Indiana Utility Regulatory Commission Cause No. 43580: Investigation by the Indiana Utility Regulatory Commission, of Smart Grid Investments and Smart Grid Information Issues Contained in 111(d) of the Public Utility Regulatory Policies Act of 1978 (16 U.S.C. § 2621(d)), as Amended by the Energy Independence and Security Act of 2007.

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

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

2008

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

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

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

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

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

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

2007

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

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

2006

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

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

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

2005

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

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

2004

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

ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS

Panelist, Customer Panel, Virginia State Bar 29th National Regulatory Conference, Williamsburg, Virginia, May 19, 2011.

Chriss, S. (2006). "Regulatory Incentives and Natural Gas Purchasing – Lessons from the Oregon Natural Gas Procurement Study." Presented at the 19th Annual Western Conference, Center for Research in Regulated Industries Advanced Workshop in Regulation and Competition, Monterey, California, June 29, 2006.

Chriss, S. (2005). "Public Utility Commission of Oregon Natural Gas Procurement Study." Public Utility Commission of Oregon, Salem, OR. Report published in June, 2005. Presented to the Public Utility Commission of Oregon at a special public meeting on August 1, 2005.

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

Chriss, S., M. Dwyer, and B. Pulliam (2002). "Impacts of Lifting the Ban on ANS Exports on West Coast

Crude Oil Prices: A Reconsideration of the Evidence." Presented at the 22nd USAEE/IAEE North American Conference, Vancouver, BC, Canada, October 6-8, 2002.

Contributed to chapter on power marketing: "Power System Operations and Electricity Markets," Fred I. Denny and David E. Dismukes, authors. Published by CRC Press, June 2002.

Contributed to "Moving to the Front Lines: The Economic Impact of the Independent Power Plant Development in Louisiana," David E. Dismukes, author. Published by the Louisiana State University Center for Energy Studies, October 2001.

Dismukes, D.E., D.V. Mesyanzhinov, E.A. Downer, S. Chriss, and J.M. Burke (2001). "Alaska Natural Gas In-State Demand Study." Anchorage: Alaska Department of Natural Resources.