

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

COMMONWEALTH EDISON COMPANY )  
 )  
Tariff filing to present the Illinois Commerce )  
Commission with an opportunity to consider revenue ) Docket No. 13-0387  
neutral tariff changes related to rate design authorized )  
by subsection 16-108.5 of the Public Utilities Act )

**REBUTTAL TESTIMONY OF**  
**STEVE W. CHRISS**  
**ON BEHALF OF THE COMMERCIAL GROUP**

**September 11, 2013**

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

2 A. My name is Steve W. Chriss. My business address is 2001 SE 10th St., Bentonville,  
3 Arkansas, 72716-0550.

4 **Q. What is your occupation and by whom are you employed?**

5 A. My title is Senior Manager, Energy Regulatory Analysis, for Wal-Mart Stores, Inc.

6 **Q. On whose behalf are you testifying?**

7 A. I am testifying on behalf of the Commercial Group, which is an ad hoc association of  
8 retail companies that own and operate retail stores within Commonwealth Edison  
9 Company's ("ComEd" or "the Company") service territory, including Best Buy Co, Inc.,  
10 J.C. Penney Corporation, Inc., Macy's, Inc., Safeway Inc., Sam's West, Inc., and Wal-  
11 Mart Stores, Inc. These commercial customers of ComEd have a significant positive  
12 economic impact on the State of Illinois. The hundreds of retail and distribution centers  
13 operated in Illinois by members of the Commercial Group support tens of thousands of  
14 Illinois employees. In addition, the group supports thousands of other Illinois businesses  
15 as well by purchasing tens of billions of dollars each year of services and supplies from  
16 Illinois businesses.

17 **Q. Please describe your education and professional experience.**

18 A. In 2001, I completed a Masters of Science in Agricultural Economics at Louisiana State  
19 University. From 2001 to 2003, I was an Analyst and later a Senior Analyst at the  
20 Houston office of Econ One Research, Inc., a Los Angeles-based consulting firm. My  
21 duties included research and analysis on domestic and international energy and regulatory  
22 issues. From 2003 to 2007, I was an Economist and later a Senior Utility Analyst at the  
23 Public Utility Commission of Oregon in Salem, Oregon. My duties included appearing

24 as a witness for PUC Staff in electric, natural gas, and telecommunications dockets. I  
25 joined the energy department at Walmart in July 2007 as Manager, State Rate  
26 Proceedings, and was promoted to my current position in June 2011. My Witness  
27 Qualifications Statement is included herein as Appendix A hereto.

28 **Q. Have you previously submitted testimony before the Illinois Commerce Commission**  
29 **(“ICC” or the “Commission”)?**

30 A. Yes, I submitted testimony on behalf of the Commercial Group in the Commonwealth  
31 Edison Company formula rate case in Docket No. 11-0271 and in the Ameren Illinois  
32 Company rate case in Docket Nos. 11-0279 through 11-0282 *consolidated*.

33 **Q. Have you previously submitted testimony before other state regulatory**  
34 **commissions?**

35 A. Yes. I have submitted testimony in over 85 proceedings before 32 other utility regulatory  
36 commissions and before two legislative committees in Missouri. My testimony has  
37 addressed topics including cost of service and rate design, ratemaking policy, qualifying  
38 facility rates, telecommunications deregulation, resource certification, energy  
39 efficiency/demand side management, fuel cost adjustment mechanisms, decoupling, and  
40 the collection of cash earnings on construction work in progress.

41 **Q. What is the purpose of your testimony?**

42 A. The purpose of my testimony is to address rate design and cost allocation to customer  
43 classes, responding specifically to the direct testimony of witnesses William R. Johnson  
44 (Staff Ex. 1.0), Greg Rockrohr (Staff Ex. 3.0), Neal Townsend (Kroger Ex. 1.0), Robert  
45 R. Stephens (IIEC Ex. 1.0) and Bradley O. Fults (REACT Ex. 3.0), and to the rebuttal  
46 testimony of Christine M. Brinkman (ComEd Ex. 5.0), Bradley L. Bjerning (ComEd Ex.  
47 7.0) and Michael F. Born (ComEd Ex. 8.0).

48 **Q. Please summarize your conclusions and recommendations to the Commission.**

49 A. My recommendations to the Commission are:

- 50 1) Regardless of the embedded cost of service study (“ECOSS”) adopted by the  
51 Commission in this proceeding, the costs shown by such ECOSS should be reflected fully  
52 in rates.
- 53 2) At a minimum, the Commission should implement a “next step” and move the non-  
54 residential classes closer to their respective costs of service.
- 55 3) If the Commission determines it appropriate to implement a “next step”, the Commission  
56 should move the non-residential classes halfway to cost, with the exception of the  
57 Railroad class, which would be moved one-third of the way to cost. Then in the  
58 subsequent rate design proceeding all customer classes would move the rest of the way to  
59 cost but for the revenues required to move the Railroad class to cost of service over the  
60 next two cases. This would better implement the Commission’s original goal of  
61 eliminating interclass rate subsidies in a gradual yet efficient manner.
- 62 4) The Commission should reach no conclusions in this proceeding concerning the  
63 SEC/SERVICES study until that study has been extended to all classes.

64

65 **Non-Residential Interclass Subsidies**

66 **Q. Generally, what is the Commercial Group’s position on setting rates based on the**  
67 **utility’s cost of service?**

68 A. The Commercial Group advocates that rates be set based on the utility’s cost of service.  
69 This will provide equitable rates that reflect cost causation principles, send proper price  
70 signals, and minimize price distortions.

71 **Q. Has the Commission put in place a process to address intraclass subsidies between**  
72 **the non-residential customer classes?**

73 A. Yes. The Commission commenced a stepped process of eliminating the rate subsidies in  
74 its 2007 Rate Case final order of Sept. 10, 2008 in Docket No. 07-0566 (p.213):

75 “Above, we determined that the proper assignment of primary and secondary  
76 distribution costs would likely reduce the total cost allocation to customers in the  
77 Extra Large Load, High Voltage, and Railroad delivery classes. It would be  
78 inconsistent with that finding to accept ComEd’s two-step rate increase. Instead,  
79 an allocation that more closely reflects a proper cost of service would be reflected

80 in a four-step, gradual movement toward rates based on the ECOSS for Extra  
81 Large Load, High Voltage, and Railroad Delivery Classes. ComEd Ex 30.0 at 43-  
82 45. Thus, the Commission authorizes a 25% movement toward ECOSS based  
83 rates for these customers, instead of a 50% movement.”

84 As such, a process – the “next step” process – was implemented to move non-residential  
85 customer classes toward their respective costs of service. However, because of flaws that  
86 the Commission found in ComEd’s ECOSS, namely the need to assign primary and  
87 secondary distribution costs, the Commission determined that the process would proceed  
88 in four steps.

89 **Q. Have other parties in this docket taken positions with respect to moving the non-**  
90 **residential customer classes toward cost?**

91 A. Yes. Among parties that have addressed this issue, there appears to be fairly broad  
92 consensus that the Commission should continue to move toward cost-based rates for the  
93 various classes. Staff witness Johnson (Staff Ex. 1.0: 608), Kroger witness Townsend  
94 (Kroger Ex. 1.0:153-157) and IIEC witness Stephens (IIEC Ex. 1.0:306-308) all  
95 recommend that the Commission take the next step toward eliminating the interclass rate  
96 subsidies among the non-residential classes that have existed for many years. Only  
97 REACT witness Fults (REACT Ex. 3.0:462) has opposed the “next step” approach. It  
98 does not appear that either CTA or Metra has taken a position on the issue.

99 **Q. What is your response to this testimony?**

100 A. The Commercial Group, at a minimum, concurs with Staff, IIEC, and Kroger that the  
101 Commission should approve a next step towards eliminating subsidies between the non-  
102 residential customer classes, subject to the concern discussed below. However, the  
103 Commission should consider eliminating the interclass rate subsidies entirely at this time

104 because of noted improvements in the Company's ECOSS and the statutory timeframe of  
105 cost of service and rate design reviews.

106 **Q. Please explain.**

107 A. ComEd witness Bjerning points out in his rebuttal testimony (ComEd Ex. 7.0:375-406)  
108 that the primary/secondary allocation noted in the Commission's Order was implemented  
109 and the Commission has determined in more recent cases that ComEd's class cost of  
110 service study has been "greatly improved" through the input of the various parties.  
111 Therefore, the basis for continued slow movement to cost appears to have been addressed  
112 and should no longer be applicable. In addition, the 2007 rate case final order did not  
113 contemplate the legislative move to supplant for a time the traditional ratemaking process  
114 with the formula rate process.

115 **Q. How does the formula rate process impact the implementation of the "next steps"?**

116 A. The statute provides for a rate design investigation proceeding to occur every three years  
117 but it appears that on this case's current procedural schedule any "next step" authorized  
118 in this current proceeding would not be implemented until January 2015 (ComEd Ex.  
119 1.0:80-83) . That would mean that the subsequent "next step" would not occur until at  
120 least 2018, about a decade after the Commission's 2007 Rate Case Order. Therefore, the  
121 Commercial Group recommends that the Commission eliminate interclass subsidies  
122 entirely.

123 **Q. Do you have any additional concerns regarding the "next step"?**

124 A. Yes. Staff Ex. 1.0 Attachment 1.01 shows that the "next step" would actually result in at  
125 least one subsidized rate class moving further from cost. This is not an appropriate result

126 for a process meant to move the non-residential customer classes close to their respective  
127 costs of service.

128 **Q. What are the recommendations of the Commercial Group on this issue?**

129 A. Regardless of the ECOSS adopted by the Commission in this proceeding, the costs shown  
130 by such ECOSS should be reflected fully in rates. As ComEd witness Brinkman  
131 succinctly put it: “If one customer class does not pay its fair share of costs, another  
132 customer class pays more than its fair share of costs.” ComEd Ex. .0:138-140. The  
133 Medium, Large and Very Large load classes have been paying more than their cost of  
134 service for many years and it is only fair that this subsidy burden should be removed.

135 At a minimum, however, the Commission should implement a “next step” and  
136 move the non-residential classes closer to their respective costs of service.

137 **Q. Do you have any proposal in the event that the Commission desires to continue a  
138 stepped approach for eliminating interclass rate subsidies?**

139 A. If the Commission determines it appropriate to implement a “next step” towards cost of  
140 service, the Commission should move the non-residential classes halfway to cost, with  
141 the exception of the Railroad class, which would be moved one-third of the way to cost.  
142 Then in the subsequent rate design proceeding all customer classes would move the rest  
143 of the way to cost but for the revenues required to move the Railroad class to cost of  
144 service over the next two cases. This would implement the Commission’s original goal  
145 of eliminating interclass rate subsidies in a gradual yet efficient manner.

146            **Distribution Losses**

147    **Q.    To what points are you responding from the testimony of Mr. Born and Mr.**  
148            **Rockrohr?**

149    A.    Mr. Rockrohr examined ComEd’s secondary and service loss study (ComEd Ex. 4.02)  
150            and testifies that the study improves the prior methodology by identifying actual  
151            customer loads and verifying the actual distribution facilities ComEd uses to supply those  
152            customers, although he pointed out that this improvement was limited to the Single  
153            Family, Multi-Family, Multi-Family with space heat and the 0 to 100 kW categories.  
154            Staff Ex. 3.0: 89-105. Mr. Rockrohr noted that this new analysis resulted in sharply  
155            lower combined secondary (SEC) and services losses for these categories but “[t]o treat  
156            customers fairly, ComEd should use expanded samples and actual loads and conductor  
157            sizes/lengths ... [for] each of its customer categories supplied by both secondary and  
158            service elements – not only four of the customer categories.” *Id.* at 143-152.

159    **Q.    How did this issue arise?**

160    A.    In the 2010 rate case, the Commercial Group questioned a large increase in the allocation  
161            of SEC/SERVICES losses to the Medium and Large classes that was caused by a new  
162            rough estimate of such losses, particularly where such customers do not use secondary  
163            service. The Commission then ordered that “ComEd shall segregate the SEC and  
164            SERVICE elements in any future rate case.” Docket No. 10-0467 final order, p.291.  
165            ComEd then began to segregate these elements and in its updated Secondary and Service  
166            Loss Study increased the sample size for the residential and small business classes from  
167            48 to 400 and performed field review of actual conductor size, type and length for the  
168            facilities of these classes being sampled.

169 **Q. How did Mr. Born respond to Mr. Rockrohr's testimony?**

170 A. Mr. Born agreed that a "field survey [should be conducted] of actual secondary and  
171 service conductor installations utilized by customer categories that were not surveyed for  
172 the Secondary and Service Loss Study filed as ComEd Ex. 4.02." ComEd Ex. 8.0:32-35.  
173 He then proposed to complete this survey work in time to submit the results in the 2014  
174 formula rate update case.

175 **Q. Does the Commercial Group agree with this approach?**

176 A. Yes. Therefore, the Commercial Group recommends that the Commission reach no  
177 conclusions in this proceeding concerning the SEC/SERVICES study until that survey  
178 has been extended to all classes served by secondary and service facilities, as both Staff  
179 and ComEd propose.

180 **Q. Does this complete your testimony?**

181 A. Yes, it does.

## Appendix A

**Steve W. Chriss**

**Senior Manager, Energy Regulatory Analysis**

**Wal-Mart Stores, Inc.**

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

**Business Phone: (479) 204-1594**

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### **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	<b>Louisiana State University</b>	M.S., Agricultural Economics
1997-1998	<b>University of Florida</b>	Graduate Coursework, Agricultural Education and Communication
1997	<b>Texas A&amp;M University</b>	B.S., Agricultural Development B.S., Horticulture

### **TESTIMONY BEFORE REGULATORY COMMISSIONS**

*2013*

Iowa Utilities Board Docket No. RPU-2013-0004: In Re: MidAmerican Energy Company.

South Dakota Public Utilities Commission Docket No. EL12-061: In the Matter of the Application of Black Hills Power, Inc. for Authority to Increase its Electric Rates. (filed with confidential stipulation)

Kansas Corporation Commission Docket No. 13-WSEE-629-RTS: In the Matter of the Applications of Westar Energy, Inc. and Kansas Gas and Electric Company for Approval to Make Certain Changes in their Charges for Electric Service.

Public Utility Commission of Oregon Docket No. UE 263: In the Matter of PACIFICORP, dba PACIFIC POWER, Request for a General Rate Revision.

Arkansas Public Service Commission Docket No. 13-028-U: In the Matter of the Application of Entergy Arkansas, Inc. for Approval of Changes in Rates for Retail Electric Service.

Virginia State Corporation Commission Docket No. PUE-2013-00020: Application of Virginia Electric and Power Company for a 2013 Biennial Review of the Rates, Terms, and Conditions for the Provision of Generation, Distribution, and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Florida Public Service Commission Docket No. 130040-EI: Petition for Rate Increase by Tampa Electric Company.

South Carolina Public Service Commission Docket No. 2013-59-E: Application of Duke Energy Carolinas, LLC, for Authority to Adjust and Increase Its Electric Rates and Charges.

Public Utility Commission of Oregon Docket No. UE 262: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY, Request for a General Rate Revision.

New Jersey Board of Public Utilities Docket No. ER12111052: In the Matter of the Verified Petition of Jersey Central Power & Light Company For Review and Approval of Increases in and Other Adjustments to Its Rates and Charges For Electric Service, and For Approval of Other Proposed Tariff Revisions in Connection Therewith; and for Approval of an Accelerated Reliability Enhancement Program (“2012 Base Rate Filing”)

North Carolina Utilities Commission Docket No. E-7, Sub 1026: In the Matter of the Application of Duke Energy Carolinas, LLC for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina.

Public Utility Commission of Oregon Docket No. UE 264: PACIFICORP, dba PACIFIC POWER, 2014 Transition Adjustment Mechanism.

Public Utilities Commission of California Docket No. 12-12-002: Application of Pacific Gas and Electric Company for 2013 Rate Design Window Proceeding.

Public Utilities Commission of Ohio Docket Nos. 12-426-EL-SSO, 12-427-EL-ATA, 12-428-EL-AAM, 12-429-EL-WVR, and 12-672-EL-RDR: In the Matter of the Application of the Dayton Power and Light Company Approval of its Market Offer.

Minnesota Public Utilities Commission Docket No. E-002/GR-12-961: In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota.

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

*2012*

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

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

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

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

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

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

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

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

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

New Jersey Board of Public Utilities Docket No. ER11080469: In the Matter of the Petition of Atlantic City Electric for Approval of Amendments to Its Tariff to Provide for an Increase in

Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1 and For Other Appropriate Relief.

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

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

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

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

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

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

#### *2011*

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2010

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2009

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

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

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

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

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

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

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

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

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

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

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

2008

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

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

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

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

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

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

2007

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

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

2006

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

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

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

2005

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

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

2004

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

## **TESTIMONY BEFORE LEGISLATIVE BODIES**

2012

Regarding Missouri House Bill 1488: Testimony Before the Missouri House Committee on Utilities, February 7, 2012.

2011

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

## **AFFADAVITS**

2011

Colorado Public Utilities Commission Docket No. 11M-951E: In the Matter of the Petition of Public Service Company of Colorado Pursuant to C.R.S. § 40-6-111(1)(d) for Interim Rate Relief Effective on or before January 21, 2012.

## **ENERGY INDUSTRY PUBLICATIONS AND PRESENTATIONS**

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

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

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

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

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

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

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

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