

Stephanie U. Eaton
336.631.1062
seaton@spilmanlaw.com
*Licensed in FL, NC and SC

May 26, 2020

VIA ELECTRONIC FILING

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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

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

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

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

Dear Mr. Teitzman:

Please find enclosed for filing in the above-referenced cases on behalf of Walmart Inc. the Direct Testimony and Exhibit SWC-1 of Steve W. Chriss and the Direct Testimony and Exhibit LVP-1 of Lisa V. Perry.

Please contact me if you have any questions concerning this filing.

Sincerely,

/s/ Stephanie U. Eaton

Stephanie U. Eaton (Florida Bar No. 165610)

seaton@spilmanlaw.com

Derrick Price Williamson
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com

SUE:sds

Enclosures

c: Parties of Record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail to the following parties this 26th day of May, 2020.

James D. Beasley
J. Jeffrey Wahlen
Malcolm N. Means
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com
mmeans@ausley.com

Paula Brown, Manager
Regulatory Coordination
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601
regdept@tecoenergy.com

Dianne M. Triplett
Duke Energy Florida, LLC
299 First Avenue North
St. Petersburg, FL 33701
Dianne.Triplett@Duke-Energy.com

Matthew R. Bernier
Duke Energy Florida, LLC
106 East College Avenue, Suite 800
Tallahassee, FL 32301
matthew.bernier@duke-energy.com
flregulatorylegal@duke-energy.com

Kenneth A. Hoffman
Mark Bubriski
Gulf Power Company
134 W. Jefferson Street
Tallahassee, FL 32301
ken.hoffman@fpl.com
mark.bubriski@nexteraenergy.com

Russell A. Badders
Gulf Power Company
One Energy Place
Pensacola, FL 32520
russell.badders@nexteraenergy.com

John T. Burnett
Jason A. Higginbotham
Christopher T. Wright
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
john.t.burnett@fpl.com
jason.higginbotham@fpl.com
Christopher.wright@fpl.com

Charles Murphy
Rachael Dziechciarz
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd., Room 110
Tallahassee, FL 32399-0850
cmurphy@psc.state.fl.us
rdziehc@psc.state.fl.us

Certificate of Service

Docket Nos. 20200067-EI, 20200069-EI, 20200070-EI, and 20200071-EI

Page 2

J. R. Kelly
Charles Rehwinkel
A. Mireille Fall-Fry
Thomas A. (Tad) David
Patricia A. Christensen
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400
kelly.jr@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
fall-fry.mireille@leg.state.fl.us
david.tad@leg.state.fl.us
christensen.patty@leg.state.fl.us

James W. Brew
Laura Wynn Baker
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Suite 800 West
Washington, DC 20007-5201
jbrew@smxblaw.com
lwb@smxblaw.com

/s/ Stephanie U. Eaton

Stephanie U. Eaton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company))))	DOCKET NO. 20200067-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC))))	DOCKET NO. 20200069-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Gulf Power Company))))	DOCKET NO. 20200070-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company))))	DOCKET NO. 20200071-EI FILED: May 26, 2020

DIRECT TESTIMONY AND EXHIBIT OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Contents

Introduction 1

Purpose of Testimony and Summary of Recommendations 4

Rate Design for Recovery of SPP Costs 5

 Table 1. Proposed Allocators for SPP Transmission and Distribution Costs..... 7

 Table 2. Proposed Illustrative Rate Designs for SPP Cost Recovery..... 8

Exhibits

Exhibit SWC-1: Witness Qualifications Statement

1 **Introduction**

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

3 A. My name is Steve W. Chriss. My business address is 2608 SE J St., Bentonville,
4 Arkansas 72712. I am employed by Walmart Inc. ("Walmart") as Director, Energy
5 Services.

6 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THESE DOCKETS?**

7 A. I am testifying on behalf of Walmart.

8 **Q. IS WALMART SPONSORING THE TESTIMONY OF ANOTHER WITNESS IN THESE**
9 **DOCKETS?**

10 A. Yes. Walmart is sponsoring the testimony of Lisa V. Perry, Senior Manager, Energy
11 Services.

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

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

1 Regulatory Analysis, in June 2011. I was promoted to my current position in October
2 2016, and the position was re-titled in October 2018. My Witness Qualifications
3 Statement is attached as Exhibit SWC-1.

4 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE FLORIDA PUBLIC**
5 **SERVICE COMMISSION ("COMMISSION")?**

6 A. Yes. I testified in Docket Nos 20110138-EI, 20120015-EI, 20130040-EI, 20130140-EI,
7 20140002-EG, 20160021-EI, 20160186-EI, and 20190061-EI.

8 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE**
9 **REGULATORY COMMISSIONS?**

10 A. Yes. I have submitted testimony in over 210 proceedings before 40 other utility
11 regulatory commissions. I have also submitted testimony before legislative
12 committees in Kansas, Missouri, North Carolina, and South Carolina. My testimony
13 has addressed topics including, but not limited to, cost of service and rate design,
14 return on equity ("ROE"), revenue requirements, ratemaking policy, large customer
15 renewable programs, qualifying facility rates, telecommunications deregulation,
16 resource certification, energy efficiency/demand side management, fuel cost
17 adjustment mechanisms, decoupling, and the collection of cash earnings on
18 construction work in progress ("CWIP").

1 **Q. DO YOU HOLD ANY ENERGY-RELATED MEMBERSHIPS WITHIN THE STATE OF**
2 **FLORIDA?**

3 A. Yes. I am a member of the Florida Advisory Council on Climate and Energy.¹

4 **Q. ARE YOU SPONSORING EXHIBITS IN YOUR TESTIMONY?**

5 A. Yes. I am sponsoring the exhibit listed in the Table of Contents.

6 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN FLORIDA.**

7 A. As shown on Walmart's website, Walmart operates 384 retail units and eight
8 distribution centers and employs over 106,000 associates in Florida. In fiscal year
9 ending 2020, Walmart purchased \$7.4 billion worth of goods and services from
10 Florida-based suppliers, supporting over 87,000 supplier jobs.²

11 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS WITHIN THE SERVICE**
12 **TERRITORIES OF EACH OF THE UTILITIES IN THESE COMBINED DOCKETS.**

13 A. Walmart has 73 retail units and one distribution center served by Duke Energy Florida,
14 LLC ("DEF"), 149 retail units and four distribution centers served by Florida Power &
15 Light Company ("FPL"), 28 retail units served by Gulf Power Company ("Gulf"), and 36
16 retail units and one distribution center served by Tampa Electric Company ("TECO").³

¹ <https://www.fdacs.gov/Energy/Florida-Advisory-Council-on-Climate-and-Energy>

² <http://corporate.walmart.com/our-story/locations/united-states#/united-states/florida>

³ FPL, Gulf, DEF, and TECO are collectively referred to as "Utilities."

1 **Purpose of Testimony and Summary of Recommendations**

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

3 A. The purpose of my testimony is to respond to the 2020-2029 Transmission and
4 Distribution Storm Protection Plan ("SPP") filings submitted by DEF, FPL, Duke, and
5 TECO pursuant to Rule 25-6.030 of the Florida Administrative Code, specifically
6 regarding the issue of rate design. Walmart recognizes that, pursuant to Rule 25-
7 6.031 F.A.C., the Commission has also opened Docket No. 20200092-EI to examine
8 the Storm Protection Plan Recovery Clause ("SPPRC") for each utility, and we will
9 address the topic in that forum as well; however, because each utility has referred to
10 cost allocation, cost recovery, and provided illustrative rate designs in their
11 representation of estimated customer impacts in these dockets, we are providing the
12 response detailed in my testimony.

13 **Q. PLEASE SUMMARIZE WALMART'S RECOMMENDATIONS TO THE COMMISSION.**

14 A. Walmart's recommendations to the Commission are as follows:

- 15 1) Walmart does not take a position on the Utilities' proposed SPP cost allocation
16 methodologies at this time. However, to the extent that alternative cost of service
17 models or modifications to the models for each utility are proposed by other parties,
18 Walmart reserves the right to address any such proposals.
- 19 2) Walmart does not oppose the proposed illustrative rate designs for SPP cost recovery
20 put forth by FPL and TECO, which recover SPP costs from demand-metered customers
21 through a \$/kW demand charge.

1 3) The Commission should reject the proposed illustrative rate designs of DEF and Gulf,
2 which recover SPP costs from demand-metered customers through a \$/kWh energy
3 charge. Instead, the Commission should require DEF and Gulf to charge demand-
4 metered customers on a demand, or \$/kW, charge.

5 **Q. DOES THE FACT THAT YOU MAY NOT ADDRESS AN ISSUE OR POSITION ADVOCATED**
6 **BY THE UTILITIES INDICATE WALMART'S SUPPORT?**

7 A. No. The fact that an issue is not addressed herein or in related filings should not be
8 construed as an endorsement of, agreement with, or consent to any filed position.

9

10 **Rate Design for Recovery of SPP Costs**

11 **Q. GENERALLY, WHAT IS WALMART'S POSITION ON SETTING RATES BASED ON THE**
12 **UTILITY'S COST OF SERVICE?**

13 A. Walmart advocates that rates be set based on the utility's cost of service for each rate
14 class. This produces equitable rates that reflect cost causation, sends proper price
15 signals, and minimizes price distortions.

16 **Q. WHAT IS YOUR UNDERSTANDING OF THE COSTS TO BE INCURRED BY EACH UTILITY**
17 **IN EXECUTING ON THEIR RESPECTIVE SPPs?**

18 A. My understanding is that Rule 25-6.030 of the Florida Administrative Code targets the
19 enhancement of a utility's transmission and distribution infrastructure in order to
20 reduce restoration costs and outage times associated with extreme weather in order
21 to improve overall service reliability.

1 **Q. IS IT YOUR UNDERSTANDING THAT TRANSMISSION AND DISTRIBUTION**
2 **INFRASTRUCTURE COSTS ARE FIXED AND DO NOT CHANGE WITH THE AMOUNT OF**
3 **ENERGY CONSUMED BY CUSTOMERS?**

4 A. Yes.

5 **Q. IN YOUR EXPERIENCE, ARE TRANSMISSION AND DISTRIBUTION COSTS**
6 **TRADITIONALLY ALLOCATED TO CUSTOMERS USING DEMAND-BASED ALLOCATORS?**

7 A. Yes, as the fixed transmission and distribution costs are incurred to ensure that the
8 utilities can meet the instantaneous peak customer demands across their systems.
9 My general understanding of Florida's utilities is that they typically allocate their
10 transmission demand costs based on each class's contribution to the respective
11 utility's 12 monthly coincident peaks ("12 CP").⁴ Additionally, my general
12 understanding is that the utilities typically allocate their distribution demand costs
13 based on each class's non-coincident peak demand ("NCP" for DEF, Gulf, and TECO,
14 and "GCP" for FPL).⁵

15 **Q. HOW HAS EACH UTILITY PROPOSED TO ALLOCATE SPP COSTS IN THIS DOCKET?**

16 A. Per utility discovery request responses in this docket, the utilities propose to allocate
17 SPP costs as follows:

⁴ Each utility may treat specific costs differently. As an example, FPL allocates transmission pull-offs for transmission-level customers on a customer basis. See *Petition for rate increase by Florida Power & Light Company*, Docket No. 20160021-EI, Direct Testimony of Renae B. Deaton (filed Mar. 15, 2016), page 22, line 2 to line 3.

⁵ Some distribution costs may be classified as customer-related, but it does not appear that any of the Utilities propose to classify any SPP costs in that manner.

Table 1. Proposed Allocators for SPP Transmission and Distribution Costs.

Utility	Allocation of Transmission Costs	Allocation of Distribution Costs
DEF	12 CP	NCP
FPL	12 CP	GCP
Gulf	12 CP for Transmission Demand Costs, Energy for Transmission Energy Costs (approximately 3% of proposed SPP costs)	NCP
TECO	12 CP	NCP

Sources:

DEF: 20200069 DEF Resp to OPC POD-Pt3.pdf

FPL: FPL SPP Rate Impact Calculation 2020-2022 POD 15

Gulf: OPC's 2nd POD No. 15 – SPP – Annual Rev Req Calc GULF Rate Impact Calc

TECO: (BS 9) SPP Allocation Spreadsheets for Rate Impact Percentage Using Full Cost

1

2 **Q. DOES WALMART TAKE A POSITION ON THE UTILITY ALLOCATION METHODS FOR SPP**
 3 **COSTS AT THIS TIME?**

4 A. No. However, to the extent that alternative cost of service models or modifications
 5 to the models for each utility are proposed by other parties, Walmart reserves the
 6 right to address any such proposals.

7 **Q. WHAT IS YOUR UNDERSTANDING OF THE PROPOSED ILLUSTRATIVE RATE DESIGNS**
 8 **PROVIDED BY EACH UTILITY?**

9 A. My understanding is that the Utilities provided the following illustrative rate designs
 10 with their filings and/or in discovery responses:

Table 2. Proposed Illustrative Rate Designs for SPP Cost Recovery.

Utility	Non-Demand Metered Classes	Demand-Metered Classes
DEF	\$/kWh energy charge	\$/kWh energy charge
FPL	\$/kWh energy charge	\$/kW demand charge
Gulf	\$/kWh energy charge	\$/kWh energy charge
TECO ⁶	\$/kWh energy charge	\$/kW demand charge

Sources:

DEF: 20200069 DEF Resp to OPC POD-Pt3.pdf

FPL: Storm Protection Plan 2020-2029, page 43 and FPL SPP Rate Impact Calculation 2020-2022 POD 15

Gulf: OPC's 2nd POD No. 15 – SPP – Annual Rev Req Calc GULF Rate Impact Calc

TECO: Prepared Direct Testimony of A. Sloan Lewis, page 10, line 14 to line 16. (BS 9) SPP Allocation Spreadsheets for Rate Impact Percentage Using Full Cost

1

2 **Q. DOES WALMART OPPOSE THE PROPOSED ILLUSTRATIVE RATE DESIGNS PUT FORTH**
 3 **BY FPL AND TECO?**

4 A. No. FPL and TECO have appropriately designed the proposed illustrative SPP cost
 5 recovery rates to reflect cost causation.

6 **Q. DOES WALMART HAVE A CONCERN WITH THE PROPOSED ILLUSTRATIVE RATE**
 7 **DESIGNS PUT FORTH BY DEF AND GULF?**

8 A. Yes. By proposing illustrative \$/kWh energy rates for demand metered customers,
 9 DEF and Gulf propose to recover SPP costs differently than how those costs will be
 10 incurred and allocated to customers, with the caveat that, as noted in Table 1 above,
 11 approximately three percent of Gulf's proposed SPP cost is classified as transmission

⁶ In testimony, TECO breaks the charges down as a \$/kWh energy charge for residential customers, and a \$/kW demand charge for commercial and industrial Customers. See Direct Testimony of A. Sloan Lewis, page 10, line 14 to line 16.

1 energy.

2 **Q. PLEASE EXPLAIN.**

3 A. As described earlier, the Utilities will incur demand-related costs as they execute on
4 their respective SPPs. Demand costs are fixed costs incurred by the utilities to size
5 their systems such that they can meet the peak kW demands imposed by their rate
6 classes and do not vary with changes in how many kWh of energy are consumed by
7 their customers. These demand-related costs should be recovered in a manner that
8 reflects the way in which they are incurred and allocated.

9 **Q. DOES THE RECOVERY OF DEMAND-RELATED COSTS THROUGH AN ENERGY CHARGE**
10 **VIOLATE COST CAUSATION PRINCIPLES?**

11 A. Yes. The shift in recovering demand-related costs through an energy charge, as
12 proposed by DEF and Gulf, violates cost causation principles, which hold that, to the
13 extent possible, costs should be allocated to, and recovered from customers on the
14 same basis (*i.e.*, demand-related costs should be recovered through demand charges
15 and energy-related costs should be recovered through energy charges).

16 **Q. DOES RECOVERY OF DEMAND-RELATED COSTS THROUGH AN ENERGY CHARGE**
17 **CREATE INTRA-CLASS COST SHIFTS?**

18 A. Yes. The change in recovering demand-related costs from per kW demand charges to
19 per kWh energy charges results in a shift in demand cost responsibility from lower
20 load factor customers to higher load factor customers. Two customers can have the
21 same level of demand and cause the utility to incur the same amount of fixed cost,

1 but because one customer uses more kWhs than the other, that customer will pay
2 more of the demand cost than the customer that uses fewer kWhs. This results in a
3 misallocation of cost responsibility as higher load factor customers overpay for the
4 demand-related costs incurred by the utilities to serve them. In other words, higher
5 load factor customers are paying for a portion of the demand-related costs that are
6 incurred to serve lower load factor customers simply because of the manner in which
7 the utility recovers those costs in rates.

8 **Q. CAN YOU PROVIDE A GENERAL ILLUSTRATION OF THIS SHIFT IN DEMAND COST**
9 **RESPONSIBILITY?**

10 A. Yes. Assume the following:

- 11 1) A utility has only two customers (Customer 1 and Customer 2), with individual
12 peak demands of 20 kW for a total system load of 40 kW.
- 13 2) The annual revenue requirement or cost to the utility associated with the
14 investment to serve these customers is \$2,000, which will be recovered each year.
15 Each customer is responsible for one-half of the cost, or \$1,000 of demand-related
16 or fixed costs per customer.
- 17 3) Customer 1 has a monthly demand of 20 kW and a load factor of 60 percent and
18 consumes 105,120 kWh/year (20 kW * 60% * 8760 hours).
- 19 4) Customer 2 has a monthly demand of 20 kW and a load factor of 30 percent and
20 consumes 52,560 kWh/year (20 kW * 30% * 8760 hours).

1 **Q. IN YOUR ILLUSTRATION, IF THE DEMAND-RELATED COSTS WERE RECOVERED**
2 **THROUGH A DEMAND CHARGE ON A PER KW BASIS, WHAT WOULD THE PER KW**
3 **CHARGE BE?**

4 A. The charge would be \$4.17 per kW-month ($\$2,000 / 40 \text{ kW} / 12 \text{ months}$). Each
5 customer would then pay \$1,000 for the demand-related cost they impose on the
6 system ($20 \text{ kW} * \$4.17/\text{kW} * 12$).

7 **Q. IN YOUR ILLUSTRATION, IF THE DEMAND-RELATED COSTS WERE RECOVERED ON AN**
8 **ENERGY BASIS, WHAT WOULD THE PER KWH CHARGE BE?**

9 A. If customers were charged on a per kWh basis, the energy charge would be 1.27 cents
10 per kWh ($\$2,000 / 157,860 \text{ kWh}$), where the \$2,000 is the total cost, and 157,860 kWh
11 represents the total annual energy sales.

12 **Q. IN YOUR ILLUSTRATION, WHAT WOULD EACH CUSTOMER PAY UNDER THE PER KWH**
13 **CHARGE OF 1.27 CENTS PER KWH?**

14 A. Customer 1, the customer with the higher load factor of 60 percent, would pay \$1,333
15 ($\$0.0127/\text{kWh} * 105,120 \text{ kWh}$). Customer 2, the customer that has the lower load
16 factor would pay \$667 ($\$0.0127/\text{kWh} * 52,560 \text{ kWh}$).

17 **Q. ARE THE RESULTING ENERGY BASED CHARGES IN YOUR ILLUSTRATION**
18 **REPRESENTATIVE OF THE UNDERLYING COSTS?**

19 A. No. As the example makes clear, if a utility recovers its demand-related costs through
20 energy-based charges, it will over-collect from one customer and under-collect from
21 the other. The fixed costs are equally incurred by Customer 1 and Customer 2,

1 however, under the per kWh scenario, the utility would recover \$333 more from
2 Customer 1 (a higher load factor customer) than its cost responsibility and \$333 less
3 from Customer 2 (a lower load factor customer) than its cost responsibility. In other
4 words, Customer 1, would be subsidizing one-third of Customer 2's cost responsibility.

5 **Q. WOULD THE RECOVERY OF SPP REVENUE REQUIREMENT THROUGH THE DEMAND**
6 **CHARGE BE BENEFICIAL TO THE DEF AND GULF?**

7 A. Yes. By recovering a large percentage of a class revenue requirement through energy
8 charges, a utility subjects itself to under and over-recovery of its revenue requirement
9 due to fluctuations in customer usage. As such, issues such as weather and the
10 economy will have a greater impact on cost recovery versus a rate design in which an
11 appropriate amount of revenue requirement is collected through the demand charge.

12 **Q. WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION ON THIS ISSUE?**

13 A. The Commission should reject the proposed illustrative rate designs of DEF and Gulf,
14 which recover SPP costs from demand-metered customers through a \$/kWh energy
15 charge. Instead, the Commission should require DEF and Gulf to charge demand-
16 metered customers on a demand, or \$/kW, charge. Walmart recognizes that a small
17 portion of Gulf's SPP costs are classified by Gulf as transmission energy, as discussed
18 above, but presents this proposal as a way to more accurately reflect cost causation
19 while implementing an administratively efficient rate structure.

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

21 A. Yes.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company))))	DOCKET NO. 20200067-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC))))	DOCKET NO. 20200069-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Gulf Power Company))))	DOCKET NO. 20200070-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company))))	DOCKET NO. 20200071-EI

EXHIBIT OF
STEVE W. CHRISS
ON BEHALF OF
WALMART INC.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2020-2029 Storm Protection)	DOCKET NO. 20200067-EI
Plan pursuant to Rule 25-6.030, F.A.C., Tampa)	
Electric Company)	
)	
In re: Review of 2020-2029 Storm Protection)	DOCKET NO. 20200069-EI
Plan pursuant to Rule 25-6.030, F.A.C., Duke)	
Energy Florida, LLC)	
)	
In re: Review of 2020-2029 Storm Protection)	DOCKET NO. 20200070-EI
Plan pursuant to Rule 25-6.030, F.A.C., Gulf)	
Power Company)	
)	
In re: Review of 2020-2029 Storm Protection)	DOCKET NO. 20200071-EI
Plan pursuant to Rule 25-6.030, F.A.C.,)	
Florida Power & Light Company)	

EXHIBIT SWC-1 OF

STEVE W. CHRISS

ON BEHALF OF

WALMART INC.

Steve W. Chriss

Walmart Inc.

Business Address: 2608 SE J Street, Bentonville, Arkansas 72716

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

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

2020

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.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 2 of 24**

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 Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 3 of 24**

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 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.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 4 of 24**

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.

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.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 5 of 24**

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 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.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 6 of 24**

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.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 7 of 24**

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.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 8 of 24**

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.

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.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 9 of 24**

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.

Public Utilities Commission of Ohio Case No. 14-1693-EL-RDR: In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter Into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider.

Public Service Commission of Wisconsin Docket No. 6690-UR-124: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates.

Arkansas Public Service Commission Docket No. 15-034-U: In the Matter of an Interim Rate Schedule of Oklahoma Gas and Electric Company Imposing a Surcharge to Recover All Investments and Expenses Incurred Through Compliance with Legislative or Administrative Rules, Regulations, or Requirements Relating to the Public Health, Safety or the Environment Under the Federal Clean Air Act for Certain of its Existing Generation Facilities.

Kansas Corporation Commission Docket No. 15-WSEE-115-RTS: In the Matter of the Application of Westar Energy, Inc. and Kansas Gas and Electric Company to Make Certain Changes in their Charges for Electric Service.

Michigan Public Service Commission Case No. U-17767: 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.

Public Utility Commission of Texas Docket No. 43695: Application of Southwestern Public Service Company for Authority to Change Rates.

Kansas Corporation Commission Docket No. 15-KCPE-116-RTS: In the Matter of the Application of Kansas City Power & Light Company to Make Certain Changes in its Charges for Electric Service.

Michigan Case No. U-17735: In the Matter of the Application of the Consumers Energy Company for Authority to Increase its Rates for the Generation and Distribution of Electricity and for Other Relief.

Kentucky Public Service Commission Case No. 2014-00396: Application of Kentucky Power Company for a General Adjustment of its Rates for Electric Service; (2) an Order Approving its 2014 Environmental Compliance Plan; (3) an Order Approving its Tariffs and Riders; and (4) an Order Granting All Other Required Approvals and Relief.

Kentucky Public Service Commission Case No. 2014-00371: In the Matter of the Application of Kentucky Utilities Company for an Adjustment of its Electric Rates.

Kentucky Public Service Commission Case No. 2014-00372: In the Matter of the Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 10 of 24**

2014

Ohio Public Utilities Commission Case No. 14-1297-EL-SSO: In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.

West Virginia Case No. 14-1152-E-42T: Appalachian Power Company and Wheeling Power Company, Both d/b/a American Electric Power, Joint Application for Rate Increases and Changes in Tariff Provisions.

Oklahoma Corporation Commission Cause No. PUD 201400229: In the Matter of the Application of Oklahoma Gas and Electric Company for Commission Authorization of a Plan to Comply with the Federal Clean Air Act and Cost Recovery; and for Approval of the Mustang Modernization Plan.

Missouri Public Service Commission Case No. ER-2014-0258: In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariff to Increase its Revenues for Electric Service.

Pennsylvania Public Utility Commission Docket No. R-2014-2428742: Pennsylvania Public Utility Commission v. West Penn Power Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428743: Pennsylvania Public Utility Commission v. Pennsylvania Electric Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428744: Pennsylvania Public Utility Commission v. Pennsylvania Power Company.

Pennsylvania Public Utility Commission Docket No. R-2014-2428745: Pennsylvania Public Utility Commission v. Metropolitan Edison Company.

Washington Utilities and Transportation Commission Docket No. UE-141368: In the Matter of the Petition of Puget Sound Energy to Update Methodologies Used to Allocate Electric Cost of Service and For Electric Rate Design Purposes.

Washington Utilities and Transportation Commission Docket No. UE-140762: 2014 Pacific Power & Light Company General Rate Case.

West Virginia Public Service Commission Case No. 14-0702-E-42T: Monongahela Power Company and the Potomac Edison Company Rule 42T Tariff Filing to Increase Rates and Charges.

Ohio Public Utilities Commission Case No. 14-841-EL-SSO: In the Matter of the Application of Duke Energy Ohio for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of Case No. 14-841-EL-SSO an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service.

Colorado Public Utilities Commission Docket No. 14AL-0660E: Re: In the Matter of the Advice Letter No. 1672-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 Rate Changes Effective July 18, 2014.

Maryland Case No. 9355: In the Matter of the Application of Baltimore Gas and Electric Company for Authority to Increase Existing Rates and Charges for Electric and Gas Service.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 11 of 24**

Mississippi Public Service Commission Docket No. 2014-UN-132: In Re: Notice of Intent of Entergy Mississippi, Inc. to Modernize Rates to Support Economic Development, Power Procurement, and Continued Investment.

Nevada Public Utilities Commission Docket No. 14-05004: Application of Nevada Power Company d/b/a NV Energy for Authority to Increase its Annual Revenue Requirement for General Rates Charged to All Classes of Electric Customers and for Relief Properly Related Thereto.

Utah Public Service Commission Docket No. 14-035-T02: In the Matter of Rocky Mountain Power's Proposed Electric Service Schedule No. 32, Service From Renewable Energy Facilities.

Florida Public Service Commission Docket No. 140002-EG: In Re: Energy Conservation Cost Recovery Clause.

Public Service Commission of Wisconsin Docket No. 6690-UR-123: Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates.

Connecticut Docket No. 14-05-06: Application of the Connecticut Light and Power Company to Amend its Rate Schedules.

Virginia Corporation Commission Case No. PUE-2014-00026: Application of Appalachian Power Company for a 2014 Biennial Review for the Provision of Generation, Distribution and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.

Virginia Corporation Commission Case No. PUE-2014-00033: Application of Virginia Electric and Power Company to Revise its Fuel Factor Pursuant to Va. Code § 56-249.6.

Arizona Corporation Commission Docket No. E-01345A-11-0224 (Four Corners Phase): 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.

Minnesota Public Utilities Commission Docket No. E-002/GR-13-868: In the Matter of the Application of Northern States Power Company, for Authority to Increase Rates for Electric Service in Minnesota.

Utah Public Service Commission Docket No. 13-035-184: 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.

Missouri Public Service Commission Case No. EC-2014-0224: In the Matter of Noranda Aluminum, Inc.'s Request for Revisions to Union Electric Company d/b/a Ameren Missouri's Large Transmission Service Tariff to Decrease its Rate for Electric Service.

Oklahoma Corporation Commission Cause No. PUD 201300217: Application of Public Service Company of Oklahoma to be in Compliance with Order No. 591185 Issued in Cause No. PUD 201100106 Which Requires a Base Rate Case to be Filed by PSO and the Resulting Adjustment in its Rates and Charges and Terms and Conditions of Service for Electric Service in the State of Oklahoma.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 12 of 24**

Public Utilities Commission of Ohio Case No. 13-2386-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.

2013

Oklahoma Corporation Commission Cause No. PUD 201300201: Application of Public Service Company of Oklahoma for Commission Authorization of a Standby and Supplemental Service Rate Schedule.

Georgia Public Service Commission Docket No. 36989: Georgia Power's 2013 Rate Case.

Florida Public Service Commission Docket No. 130140-EI: Petition for Rate Increase by Gulf Power Company.

Public Utility Commission of Oregon Docket No. UE 267: In the Matter of PACIFICORP, dba PACIFIC POWER, Transition Adjustment, Five-Year Cost of Service Opt-Out.

Illinois Commerce Commission Docket No. 13-0387: Commonwealth Edison Company Tariff Filing to Present the Illinois Commerce Commission with an Opportunity to Consider Revenue Neutral Tariff Changes Related to Rate Design Authorized by Subsection 16-108.5 of the Public Utilities Act.

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

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 13 of 24**

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.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 14 of 24**

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 Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 15 of 24**

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.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 16 of 24**

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. UE-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.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 17 of 24**

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.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 18 of 24**

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.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 19 of 24**

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

2020

Regarding Missouri Senate Joint Resolution 34: Written testimony submitted to the Missouri Senate Transportation, Infrastructure and Public Safety Committee, January 30, 2020.

2019

Regarding North Carolina Senate Bill 559: Written testimony submitted to the North Carolina Committee on Agriculture/Environment/Natural Resources, April 17, 2019.

Regarding Missouri Senate Joint Resolution 25: Written testimony submitted to the Missouri Senate Committee on Judiciary, March 28, 2019.

Regarding South Carolina House Bill 3659: Written testimony submitted to the South Carolina Senate Committee on Judiciary, March 14, 2019.

Regarding Kansas Senate Bill 69: Written testimony submitted to the Kansas Committee on Utilities, February 19, 2019.

2018

Regarding Missouri Senate Bill 564: Testimony before the Missouri Senate Committee on Commerce, Consumer Protection, Energy and the Environment, January 10, 2018.

2017

Regarding Missouri Senate Bill 190: Testimony before the Missouri Senate Committee on Commerce, Consumer Protection, Energy and the Environment, January 25, 2017.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 20 of 24**

2016

Regarding Missouri House Bill 1726: Testimony before the Missouri House Energy and Environment Committee, April 26, 2016.

2014

Regarding Kansas House Bill 2460: Testimony Before the Kansas House Standing Committee on Utilities and Telecommunications, February 12, 2014.

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.

AFFIDAVITS

2015

Supreme Court of Illinois, Docket No. 118129, Commonwealth Edison Company et al., respondents, v. Illinois Commerce Commission et al. (Illinois Competitive Energy Association et al., petitioners). Leave to appeal, Appellate Court, First District.

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, Expanding Future Procurement Options, REBA Connect: Virtual Member Summit 2020, May 13, 2020.

Panelist, Renewable Energy Options for Large Utility Customers, NARUC Center for Partnership & Innovation Webinar Series, January 16, 2020.

Panelist, Pathways to Integrating Customer Clean Energy Demand in Utility Planning, REBA: Market Innovation webinar, January 13, 2020.

Panelist, Should Full Electrification of Energy Systems be Our Goal? If it's No Longer Business as Usual, What Does That Mean for Consumers?, National Association of State Utility Consumer Advocates 2019 Annual Meeting, San Antonio, Texas, November 18, 2019.

Panelist, Fleet Electrification, Federal Utility Partnership Working Group Seminar, Washington, DC, November 8, 2019.

Panelist, Tackling the Challenges of Extreme Weather, Edison Electric Institute Fall National Key Accounts Workshop, Las Vegas, Nevada, October 8, 2019.

Panelist, Fleet Electrification: Tackling the Challenges and Seizing the Opportunities for Electric Trucks, Powering the People 2019, Washington, D.C., September 24, 2019.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 21 of 24**

Panelist, From the Consumer Perspective, Mid-American Regulatory Conference 2019 Annual Meeting, Des Moines, Iowa, August 13, 2019.

Panelist, Redefining Resiliency: Emerging Technologies Benefiting Customers and the Grid, EPRI 2019 Summer Seminar, Chicago, Illinois, August 12, 2019.

Panelist, Energy Policies for Economic Growth, 2019 Energy Policy Summit, NCSL Legislative Summit, Nashville, Tennessee, August 5, 2019.

Panelist, Gateway to Energy Empowerment for Customers, Illumination Energy Summit, Columbus, Ohio, May 15, 2019.

Panelist, Advancing Clean Energy Solutions Through Stakeholder Collaborations, 2019 State Energy Conference of North Carolina, Raleigh, North Carolina, May 1, 2019.

Panelist, Fleet Electrification: Getting Ready for the Transition, Edison Electric Institute Spring National Key Accounts Workshop, Seattle, Washington, April 8, 2019.

Panelist, Where the Fleet Meets the Pavement, Which Way to Electrification of the U.S. Transportation System?, Washington, D.C., April 4, 2019.

Panelist, Improving Renewable Energy Offerings: What Have We Learned?, Advanced Energy Economy Webinar, March 26, 2019.

Speaker, National Governors Association Southeast Regional Transportation Electrification Workshop, Nashville, Tennessee, March 11, 2019.

Speaker, Walmart Spotlight: A Day in the Life of a National Energy Manager, Touchstone Energy Cooperatives Net Conference 2019, San Diego, California, February 12, 2019.

Panelist, National Accounts: The Struggle is Real, American Public Power Association Customer Connections Conference, Orlando, Florida, November 6, 2018.

Panelist, Getting in Front of Customers Getting Behind the Meter Solutions, American Public Power Association Customer Connections Conference, Orlando, Florida, November 6, 2018.

Panelist, Sustainable Fleets: The Road Ahead for Electrifying Fleet Operations, EEI National Key Accounts 2018 Fall Workshop, San Antonio, Texas, October 23, 2018.

Panelist, Meeting Corporate Clean Energy Requirements in Virginia, Renewable Energy Buyers Alliance Summit, Oakland, California, October 15, 2018.

Panelist, What Are the Anticipated Impacts on Pricing and Reliability in the Changing Markets?, Southwest Energy Conference, Phoenix, Arizona, September 21, 2018.

Speaker, Walmart's Project Gigaton – Driving Renewable Energy Sourcing in the Supply Chain, Smart Energy Decisions Webcast Series, July 11, 2018.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 22 of 24**

Panelist, Customizing Energy Solutions, Edison Electric Institute Annual Convention, San Diego, California, June 7, 2018.

Powering Ohio Report Release, Columbus, Ohio, May 29, 2018.

Panelist, The Past, Present, and Future of Renewable Energy: What Role Will PURPA, Mandates, and Collaboration Play as Renewables Become a Larger Part of Our Energy Mix?, 36th National Regulatory Conference, Williamsburg, Virginia, May 17, 2018.

Panelist, Sustainability Milestone Deep Dive Session, Walmart Global Sustainability Leaders Summit, Bentonville, Arkansas, April 18, 2018.

Panelist, The Customer's Voice, Tennessee Valley Authority Distribution Marketplace Forum, Murfreesboro, Tennessee, April 3, 2018.

Panelist, Getting to Yes with Large Customers to Meet Sustainability Goals, The Edison Foundation Institute for Electric Innovation Powering the People, March 7, 2018.

Panelist, The Corporate Quest for Renewables, 2018 NARUC Winter Policy Summit, Washington, D.C., February 13, 2018.

Panelist, Solar and Renewables, Touchstone Energy Cooperatives NET Conference 2018, St. Petersburg, Florida, February 6, 2018.

Panelist, Missouri Public Service Commission November 20, 2017 Workshop in File No. EW-2017-0245.

Panelist, Energy and Climate Change, 2017-18 Arkansas Law Review Symposium: Environmental Sustainability and Private Governance, Fayetteville, Arkansas, October 27, 2017.

Panelist, Customer – Electric Company – Regulator Panel, Edison Electric Institute Fall National Key Accounts Workshop, National Harbor, Maryland, October 12, 2017.

Panelist, What Do C&I Buyers Want, Solar Power International, Las Vegas, Nevada, September 12, 2017.

Panelist, Partnerships for a Sustainable Future, American Public Power Association National Conference, Orlando, Florida, June 20, 2017.

Panelist, Corporate Renewable Energy Buyers in the Southeast, SEARUC 2017, Greensboro, Georgia, June 12, 2017.

Panelist, Transitioning Away from Traditional Utilities, Utah Association of Energy Users Annual Conference, Salt Lake City, Utah, May 18, 2017.

Panelist, Regulatory Approaches for Integrating and Facilitating DERs, New Mexico State University Center for Public Utilities Advisory Council Current Issues 2017, Santa Fe, New Mexico, April 25, 2017.

Presenter, Advancing Renewables in the Midwest, Columbia, Missouri, April 24, 2017.

Panelist, Leveraging New Energy Technologies to Improve Service and Reliability, Edison Electric Institute Spring National Key Accounts Workshop, Phoenix, Arizona, April 11, 2017.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 23 of 24**

Panelist, Private Sector Demand for Renewable Power, Vanderbilt Law School, Nashville, Tennessee, April 4, 2017.

Panelist, Expanding Solar Market Opportunities, 2017 Solar Power Colorado, Denver, Colorado, March 15, 2017.

Panelist, Renewables: Are Business Models Keeping Up?, Touchstone Energy Cooperatives NET Conference 2017, San Diego, California, January 30, 2017.

Panelist, The Business Case for Clean Energy, Minnesota Conservative Energy Forum, St. Paul, Minnesota, October 26, 2016.

Panelist, M-RETS Stakeholder Summit, Minneapolis, Minnesota, October 5, 2016.

Panelist, 40th Governor's Conference on Energy & the Environment, Kentucky Energy and Environment Cabinet, Lexington, Kentucky, September 21, 2016.

Panelist, Trends in Customer Expectations, Wisconsin Public Utility Institute, Madison, Wisconsin, September 6, 2016.

Panelist, The Governor's Utah Energy Development Summit 2015, May 21, 2015.

Mock Trial Expert Witness, The Energy Bar Association State Commission Practice and Regulation Committee and Young Lawyers Committee and Environment, Energy and Natural Resources Section of the D.C. Bar, Mastering Your First (or Next) State Public Utility Commission Hearing, February 13, 2014.

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.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit SWC-1, Page 24 of 24**

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.

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company))))	DOCKET NO. 20200067-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC))))	DOCKET NO. 20200069-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Gulf Power Company))))	DOCKET NO. 20200070-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company))))	DOCKET NO. 20200071-EI FILED: May 26, 2020

DIRECT TESTIMONY AND EXHIBIT OF

LISA V. PERRY

ON BEHALF OF

WALMART INC.

Contents

I. Introduction 1

II. Purpose of Testimony 2

III. Governing Statute and Administrative Rule 5

III. Strengthening the Utilities' T&D Systems with Customer-Sited Generation..... 7

Exhibits

Exhibit LVP-1: Witness Qualifications Statement

1 **I. Introduction**

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

3 A. My name is Lisa V. Perry. My business address is 2608 SE J Street, Bentonville, AR
4 72716. I am employed by Walmart Inc. ("Walmart") as Senior Manager, Energy
5 Services.

6 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THESE DOCKETS?**

7 A. I am testifying on behalf of Walmart.

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

9 A. I received a J.D. in 1999 and an LL.M. in Taxation in 2000 from the University of Florida,
10 Levin College of Law. From 2001 to 2019, I was in private practice, emphasizing in
11 Energy Law from 2007 to 2019. My practice included representing a large commercial
12 client before utility regulatory commissions in Colorado, Texas, New Mexico,
13 Arkansas, and Louisiana in matters ranging from general rate cases to renewable
14 energy programs. I joined the energy department at Walmart in September 2019. My
15 Witness Qualifications Statement is attached as Exhibit LVP-1.

16 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE FLORIDA PUBLIC SERVICE
17 COMMISSION ("COMMISSION")?**

18 A. No, I have not.

1 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE**
2 **REGULATORY COMMISSIONS?**

3 A. Yes, I have submitted testimony in Arkansas, Louisiana, Oklahoma, South Carolina,
4 Texas, and Virginia. I have also provided legal representation for customer
5 stakeholders before the state regulatory commissions of Colorado, Texas, Arkansas,
6 Louisiana, and New Mexico in the cases listed under "Commission Dockets" in Exhibit
7 LVP-1.

8 **Q. ARE YOU SPONSORING EXHIBITS IN YOUR TESTIMONY?**

9 A. Yes. I am sponsoring the exhibit listed in the Table of Contents.

10 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN FLORIDA.**

11 A. As shown on Walmart's website, Walmart operates 384 retail units and eight
12 distribution centers and employs over 106,000 associates in Florida. In fiscal year
13 ending 2020, Walmart purchased \$7.4 billion worth of goods and services from
14 Florida-based suppliers, supporting over 87,000 supplier jobs.¹

15

16 **II. Purpose of Testimony**

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

18 A. The purpose of my testimony is to offer insight with regard to the petitions listed
19 below from the perspective of a large energy customer who provides critical services

¹ <http://corporate.walmart.com/our-story/locations/united-states/florida>

1 and supplies during extreme weather events in the state of Florida. The Commission
2 consolidated the following petitions in which utilities are seeking approval of their
3 respective Transmission and Distribution ("T&D") Storm Protection Plans ("SPPs"):²

4 (1) Tampa Electric Company's ("TECO") Petition for Approval of Storm Protection
5 Plan, filed April 10, 2020, Docket No. 20200067-EI;

6 (2) Florida Public Utilities, Docket No. 20200068-EI (this docket was subsequently
7 closed by the Commission on April 6, 2020; see Order No. PSC-2020-0097-PCO-
8 EI issued April 6, 2020);

9 (3) Duke Energy Florida, LLC's ("DEF") Petition for Approval of 2020-2029 Storm
10 Protection Plan, filed April 10, 2020, Docket No. 20200069-EI;

11 (4) Petition of Gulf Power Company ("Gulf") for Approval of the 2020-2029 Storm
12 Protection Plan, filed April 10, 2020, Docket No. 20200070-EI; and

13 (5) Petition of Florida Power & Light Company ("FPL") for Approval of the 2020-
14 2029 Storm Protection Plan, filed April 10, 2020, Docket No. 20200071-EI.

15 The above-listed petitions are collectively referred to in my testimony as the
16 "Petitions" and the respective utilities are referred to collectively as the "Utilities."

² See Order No. PSC-2020-0073-PCO-EI issued April 6, 2020, Docket Nos. 20200067-EI, 20200068-EI, 20200069-EI, 20200070-EI, and 20200071-EI.

1 **Q. ARE OTHER WITNESSES FILING TESTIMONY ON BEHALF OF WALMART?**

2 A. Yes, Steve Chriss, Director, Energy Services for Walmart is also filing testimony in these
3 Dockets on behalf of Walmart. Mr. Chriss addresses the proposed illustrative rate
4 designs included in the Utilities' filings.

5 **Q. PLEASE SUMMARIZE WALMART'S RECOMMENDATIONS TO THE COMMISSION.**

6 A. The Commission should require the Utilities to work with Walmart and other
7 interested stakeholders during the interim period before the Utilities' next required
8 updated SPPs³ to develop ways in which customer-sited generation can be utilized as
9 part of the SPPs in order to strengthen the T&D systems and provide customers with
10 lower restoration costs, shorter outage periods, and more reliable electric service
11 overall.

12 **Q. DOES THE FACT THAT YOU MAY NOT ADDRESS AN ISSUE OR POSITION ADVOCATED**
13 **BY THE UTILITIES INDICATE WALMART'S SUPPORT?**

14 A. No. The fact that an issue is not addressed herein or in related filings should not be
15 construed as an endorsement of, agreement with, or consent to any filed position.

16

³ The Utilities are required to file an updated SPP at least every 3 years. See FLA. STAT. § 366.96(6); see also FLA. ADMIN. CODE ANN. r. 25-6.030(1) (2019).

1 **III. Governing Statute and Administrative Rule**

2 **Q. WHAT IS YOUR UNDERSTANDING OF THE PETITIONS?**

3 A. As required by a mandate set forth in Section 366.96 of the Florida Statutes and Rule
4 25-6.030 of the Florida Administrative Code, the Utilities filed their respective
5 Petitions in order to seek approval of their SPPs.

6 **Q. COULD YOU PLEASE PROVIDE MORE INFORMATION ABOUT THIS MANDATE?**

7 A. On June 27, 2019, Florida Governor Ron DeSantis signed into law Senate Bill 796:
8 Public Utility Storm Protection Plans, which is codified in the Florida Statutes at
9 Section 366.96 ("SPP Statute"). The SPP Statute requires Florida's regulated utilities
10 to file a 10-year forward looking plan and to update these plans at least every 3 years.
11 See FLA. STAT. § 366.96(3) and § 366.96(6) (2019). This plan is described in the SPP
12 Statute as a "transmission and distribution storm protection plan" that explains the
13 utility's systematic approach to achieving certain objectives set forth by the
14 legislature. *Id.* at 366.96(3).

15 **Q. WHAT ARE THE LEGISLATURE'S STATED OBJECTIVES?**

16 A. In its drafting of the SPP Statute, the Florida Legislature described its objectives as
17 reducing restoration costs and outage times that are associated with extreme
18 weather events and enhancing reliability. See *id.* at 366.96(3). These objectives were
19 declared to be in the state's interest. See *id.* at 366.96(1)(e). The Legislature goes on
20 to point out that strengthening a utility's transmission and distribution infrastructure

1 from these weather events not only reduces the cost to restore power, but also
2 improves service reliability for customers overall. *Id.* at (1)(d).

3 **Q. DID THE LEGISLATURE PROVIDE THE COMMISSION WITH ANY GUIDANCE WHEN**
4 **REVIEWING THE UTILITIES' SPPs?**

5 A. Yes, it did. When an SPP is filed with the Commission, it is the Commission's
6 responsibility to determine whether it is in the public interest to approve, approve
7 with modifications, or to deny the SPP. *Id.* at 366.96(5). When making this
8 determination, there are certain factors that the Legislature requires the Commission
9 to consider, including the extent to which the SPP will reduce restoration costs and
10 power outage times, how practical a certain location selected for T&D infrastructure
11 is relative to the utility's service territory, the cost/benefit to customers, and the
12 impact on customers' bills. *See id.* at 366.96(4)(a)-(d).

13 **Q. ARE THE UTILITIES' SPPs SUBJECT TO ANY REGULATIONS IN ADDITION TO THE SPP**
14 **STATUTE?**

15 A. Yes. To further its objectives, the Legislature tasked the Commission with adopting
16 rules to implement and administer the SPP Statute, which the Commission did when
17 it promulgated Rule 25-6.030 of the Florida Administrative Code ("SPP Rule"). *See id.*
18 at 366.96(11).

19

1 **III. Strengthening the Utilities' T&D Systems with Customer-Sited Generation**

2 **Q. WHAT IS THE OVERALL GOAL OF THE SPP STATUTE AND SPP RULES?**

3 A. When considering the language of the SPP Statute and the SPP Rule, the overall goal
4 of the Legislature and the Commission becomes clear – make the T&D systems more
5 reliable and resilient in order to reduce the frequency and duration of power outages
6 from hurricanes or other major storms in the most cost efficient manner. To achieve
7 this goal, the Legislature rightfully focuses on a utility's T&D facilities, which tend to
8 be the most vulnerable parts of a utility's overall system during severe weather
9 events.

10 **Q. DO THE UTILITIES ALSO SEEK TO ACHIEVE THESE SAME GOALS OR OBJECTIVES**
11 **THROUGH THEIR SPPs?**

12 A. Based upon the assertions made in the Utilities' Petitions and supporting testimony,
13 this appears to be the case. *See, e.g.,* Petition of Gulf Power Company for Approval
14 of the 2020-2029 Storm Protection Plan filed April 10, 2020, Docket No. 20200070-EI,
15 page 13, paragraph 32 (concluding that Gulf's SPP provides a systematic approach to
16 achieving the legislative objectives of reducing restoration costs and outage times due
17 to extreme weather and enhancing reliability).

18 **Q. ARE THERE WAYS IN WHICH CUSTOMERS CAN HELP A UTILITY STRENGTHEN ITS**
19 **DISTRIBUTION SYSTEM DURING A SEVERE WEATHER EVENT?**

20 A. Absolutely. Developing technologies and operational sophistication have positioned
21 large commercial customers, like Walmart, to be a valuable resource for utilities, first

1 responders, and the community at large during critical weather events. Specifically,
2 holistic planning that includes distributed energy resources ("DERs") allows a utility to
3 restore power, reduce outage times, and improve service reliability more efficiently
4 and cost effectively.

5 **Q. WHAT IS A DER?**

6 A. A DER, as defined by the National Association of Regulatory Utility Commissioners
7 ("NARUC"), is:

8 a resource sited close to customers that can provide all or some of their
9 immediate electric and power needs and can also be used by the system
10 to either reduce demand (such as energy efficiency) or provide supply to
11 satisfy the energy, capacity, or ancillary service needs of the distribution
12 grid. The resources, if providing electricity or thermal energy, are small in
13 scale, connected to the distribution system, and close to load.
14

15 *See Kiera Zitelman, Advancing Electric System Resilience with Distributed Energy*
16 *Resources: A Review of State Policies*, NARUC, April 2020, at 6 ("NARUC DER Article").

17 In other words, DERs are customer-cited sources of power or storage that typically
18 connect to and/or operate independent of the grid. Examples include customer-sited
19 generation, energy storage, demand response, electric vehicles, microgrids, and
20 energy efficiency.

21 **Q. WHAT TYPE OF SUPPORT CAN DERs PROVIDE DURING EXTREME WEATHER EVENTS?**

22 A. As discussed at some length in the NARUC DER Article, one of the many benefits of
23 DERs is helping to improve system reliability and resilience by providing dispatchable
24 generation resources that supply power when electricity from the utility is no longer

1 available. This type of generation resource can operate independently, for example,
2 by providing back-up generation for a large commercial and industrial ("C&I")
3 customer, work in conjunction with other generation resources or storage located
4 within a defined electrical boundary, also known as a microgrid,⁴ and/or inject power
5 back onto the grid.

6 **Q. HOW DOES A CUSTOMER-SITED DISPATCHABLE GENERATION RESOURCE HELP**
7 **REDUCE RESTORATION COSTS DURING EXTREME WEATHER EVENTS?**

8 A. A customer-sited dispatchable generation resource, whether operating alone or
9 within a microgrid, may help reduce restoration costs by essentially allowing one or
10 more customers to be self-sufficient during the restoration process. Restoring power
11 after a severe weather event like a hurricane is likely an extensive process that
12 requires the utility to prioritize areas that are impacted by an outage and dispatch
13 their field personnel accordingly. If a portion of the utility's large customers are being
14 supplied by power independently, it allows the utility to focus its efforts on other
15 areas. Providing a utility with this type of "breathing room" gives the utility flexibility
16 to mobilize more cost-efficient restoration plans that may not otherwise be available.

⁴ The Department of Energy defines a microgrid as "a group of interconnected loads and distributed energy resources within clearly defined electrical boundaries that acts as a single controllable entity with respect to the grid." These multiple DERs may include small fossil generation, solar photovoltaic, and storage. See NARUC DER Article at 17.

1 **Q. HOW DOES A CUSTOMER-SITED DISPATCHABLE GENERATION RESOURCE ENHANCE**
2 **RELIABILITY DURING EXTREME WEATHER EVENTS?**

3 A. Speaking from the perspective of a large commercial customer who has extensive
4 operational experience during and after hurricanes in Florida, it is Walmart's
5 experience that utility personnel who are responsible for visiting sites and restoring
6 the T&D systems require various supplies ranging from water to cell phones. It is
7 important to Walmart that it has the operational ability to serve these needs in order
8 to ensure that field personnel have what is required to restore the T&D systems and
9 turn the lights back on for everyone.

10 Moreover, it is not just utility employees who turn to Walmart and other large
11 commercial customers for necessary supplies. Walmart strives to be a leader in caring
12 for the needs of communities during times of tremendous hardship, like a hurricane
13 or other severe weather event. This includes providing supplies to first responders,
14 shelters, and citizens who live in the area and need every day basics to live. Ensuring
15 that utility customers who provide critical services and supplies can remain open and
16 operational during and after a severe weather event enables that area to restore
17 faster, which in turn, makes the T&D systems more reliable and resilient.

18 **Q. WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION?**

19 A. Walmart recommends that the Commission should require the Utilities to work with
20 Walmart and other interested stakeholders during the interim period before their

1 next required updated SPPs⁵ to develop ways in which customer-sited generation can
2 be utilized as part of the SPP in order to strengthen the T&D systems and provide
3 customers with lower restoration costs, shorter outage periods, and more reliable
4 electric service overall.

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

6 A. Yes.

⁵ The Utilities are required to file an updated SPP at least every 3 years. *See* FLA. STAT. § 366.96(6); *see also* FLA. ADMIN. CODE ANN. r. 25-6.030(1) (2019).

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company))))	DOCKET NO. 20200067-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC))))	DOCKET NO. 20200069-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Gulf Power Company))))	DOCKET NO. 20200070-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company))))	DOCKET NO. 20200071-EI FILED: May 26, 2020

**EXHIBIT OF

LISA V. PERRY

ON BEHALF OF

WALMART INC.**

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company))))	DOCKET NO. 20200067-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC))))	DOCKET NO. 20200069-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Gulf Power Company))))	DOCKET NO. 20200070-EI
In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company)))	DOCKET NO. 20200071-EI FILED: May 26, 2020

EXHIBIT LVP-1 OF

LISA V. PERRY

ON BEHALF OF

WALMART INC.

Lisa V. Perry

Senior Manager, Energy Services
Walmart Inc.

Business Address: 2608 SE J Street, Bentonville, Arkansas 72716

Business Phone: (479) 274-0238

EXPERIENCE

September 2019 – Present

Walmart Inc., Bentonville, AR

Senior Manager, Energy Services

November 2017 – September 2019

Oram & Houghton PLLC, Round Rock, TX

Of Counsel, Energy Law

February 2016 – November 2017

Ray Quinney & Nebeker, P.C., Salt Lake City, UT

Of Counsel, Energy Law

September 2007 – February 2016

Welborn, Sullivan, Meck & Tooley, P.C., Denver, CO

Partner, Energy Law

EDUCATION

2000 University of Florida Levin College of Law LL.M., Taxation

1999 University of Florida Levin College of Law J.D.

1996 University of South Florida B.A., Criminology

1993 University of South Florida B.A., Psychology

FILED TESTIMONY

2020

Arkansas Public Service Commission Docket No. 20-027-U: In the Matter of the Application of Walmart Inc. for Approval to Bid Demand Response into Wholesale Electricity Markets Through an Aggregator of Retail Customers. Issue: Seeking approval to bid demand response into MISO through a third-party aggregator.

Public Utility Commission of Texas Docket No. 49737, SOAH Docket No. 473-19-6862: Application of Southwestern Electric Power Company for Certificate of Convenience and Necessity Authorization and Related Relief for the Acquisition of Wind Generation Facilities. Issue: Seeking approval to acquire a wind generation facility located in Oklahoma.

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit LVP-1, Page 2 of 4**

Louisiana Public Service Commission Docket No. U-35324: Application of Southwestern Power Company (SWEPCO) for Certification and Approval of the Acquisition of Certain Renewable Resources in Accordance with the MBM Order and the 1983 and 1994 General Orders. Issue: Seeking approval to acquire a wind generation facility located in Oklahoma.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2019-00201: Application of Virginia Electric and Power Company for approval of its 2019 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia. Issue: Seek approval to implement eleven new demand-side management programs, to extend existing programs - some with updated parameters and cost/benefit results, and to continue three rate adjustment clauses.

2019

Oklahoma Corporation Commission Cause No. PUD 201900048: Application of Public Service Company of Oklahoma for Approval of the Cost Recovery of the Selected Wind Facilities; A Determination there is a Need for the SWFs; Approval for Future Inclusion in Base Rates Cost Recovery of Prudent Costs Incurred by PSO for the SWFs; Approval of a Temporary Cost Recovery Rider; Approval of Certain Accounting Procedures Regarding Federal Production Tax Credits; and Such Other Relief the Commission Deems PSO in Entitled. Issue: Seeking approval to acquire a wind generation facility located in Oklahoma and Wind Facility Asset Rider.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2019-00094: Application of Virginia Electric and Power Company for Approval of a 100 Percent Renewable Energy Tariff, Designated Rider TRG, Pursuant to §§ 56-577 A 5 and 56-234 of the Code of Virginia. Issue: Seek approval of a 100 percent renewable energy tariff.

Public Service Commission of South Carolina Docket No. 2019-239-E: In re: Dominion Energy South Carolina, Incorporated's Request for Approval of an Expanded Portfolio of Demand Side Management Programs, and a Modified Demand Side Management Rate Rider. Issue: Seeking approval of an expanded Demand Side Management Plan and modified Demand Side Management Rate Rider.

Arkansas Public Service Commission Docket No. 19-035-U: In the Matter of the Application of Southwestern Electric Power Company for Approval to Acquire Wind Generating Facilities Pursuant to the Arkansas Clean Energy Development Act. Issue: Seeking approval to acquire a wind generation facility located in Oklahoma and Wind Facility Asset Rider.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2019-00154: Petition of Virginia Electric and Power Company for approval of a plan for electric distribution grid transformation projects pursuant to § 56-585.1 A 6 of the Code of Virginia, and for approval of an addition to the terms and condition applicable to electric service. Issue: Seeking approval of certain expenditures relating to grid improvement and grid hardening.

COMMISSION DOCKETS (Appearing as Attorney of Record)

2019

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit LVP-1, Page 3 of 4**

Public Utility Commission of Texas Docket No. 49421: Application of CenterPoint Energy Houston Electric, LLC for Authority to Change Rates. Issue: General rate case

Public Utility Commission of Texas Docket No. 49494: Application of AEP Texas Inc. for Authority to Change Rates. Issue: General rate case

Public Utility Commission of Colorado Docket No. 19AL-0268E: In the Matter of Advice Letter No. 1797 Filed by Public Service Company of Colorado to Reset the Currently Effective General Rate Schedule Adjustment (“GRSA”) as Applied to Base Rates for all Electric Rate Schedules as well as Implement a Base Rate kWh Charge, General Rate Schedule Adjustment-Energy (“GRSA-E”) to Become Effective June 20, 2019. Issue: General rate case, Phase I

2018

Public Utility Commission of Texas Docket No. 48371: Entergy Texas, Inc.’s Statement of Intent and Application for Authority to Change Rates. Issue: General rate case

Public Utility Commission of Colorado Docket No. 18M-0074EG: In the Matter of the Commission’s Consideration of the Impact of the Federal Tax Cuts and Jobs Act of 2017 on the Rates of Colorado Investor-Owned Electric and Natural Gas Utilities. Issue: Commenced by the Commission to consider the impacts of the Tax Cut and Jobs Act of 2017 on the revenue requirements and rates of all Colorado investor-owned electric and natural gas utilities.

2017

Public Utility Commission of 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 in Oklahoma. Issue: Purchase of a wind generation facility and generation tie line.

Public Utility Commission of Texas Docket No. 47527: Application of Southwestern Public Service Company for Authority to Change Rates. Issue: General rate case

Public Utility Commission of Colorado Docket No. 17A-0462EG: In the Matter of the Application of Public Service Company of Colorado for Approval of a Number of Strategic Issues Relating to its Electric and Gas Demand-Side Management Plan. Issue: Seek Commission re-examination and approval of the overall objectives and structure of Public Service’s DSM initiatives to guide the Company in designing future DSM plans.

Public Utility Commission of Colorado Docket No. 17AL-0649E: In the Matter of Advice Letter No. 1748-Electric Filed by Public Service Company of Colorado to Revise its PUC No. 8-Electric Tariff to Implement a General Rate Schedule Adjustment and Other Rate Changes Effective on Thirty Days’ Notice. Issue: General rate case, Phase I

Arkansas Public Service Commission 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

**Florida Public Service Commission Consolidated Docket Nos. 20200067-EI,
20200069-EI, 20200070-EI, and 20200071-EI
Witness Qualification Statement
Exhibit LVP-1, Page 4 of 4**

to Construct a Dedicated Generation Tie Line. Issue: Purchase of a wind generation facility and generation tie line.

Louisiana Public Service Commission Docket No. U-34619: 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. Issue: Purchase of a wind generation facility and generation tie line.

2016

Public Utility Commission of Colorado Docket No. 16AL-0048E: 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. Issue: General rate case, Phase II

Public Utility Commission of Colorado Docket No. 16A-0055E: In the Matter of the Application of Public Service Company of Colorado for Approval of its Solar*Connect Program. Issue: Implement a voluntary solar program offering participating customers the ability to offset their current supply of energy from the Public Service system with solar energy produced at a dedicated facility or facilities.

New Mexico Public Regulation Commission Docket 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 Notice No. 533. Issue: General rate case

INDUSTRY TRAINING

2020 IPU Accounting and Ratemaking Course, Michigan State University

2016 Western NARUC Utility Rate School

EUCI Courses on the utility industry, cost allocation, and rate design.