



Higgins
Cavanagh
Cooney

STEPHEN B. LANG
JAMES A. RUGGIERI*
JAMES T. HORNSTEIN*
JOHN F. KELLEHER*
PAUL S. CALLAGHAN*
SUSAN PEPIN FAY*
PETER E. GARVEY**
CHRISTINE D'ORSI FITTA
STEPHEN P. COONEY*
KELLY A. KINCAID*
COURTNEY L. MANCHESTER*
J. DAVID FREEL*†
KRISTINA I. HULTMAN*
JONATHAN P. CARDOSI*

*Also Admitted in MA
**Also Admitted in CT
***Also Admitted in MA & MI
† Also Admitted in NJ

OF COUNSEL

GERALD C. DEMARIA*
CHARLES A. HAMBLY, JR.
MELISSA M. HORNE***

JAMES H. HIGGINS, JR.
1952-1975

JOSEPH V. CAVANAGH
1952-1985

JOHN P. COONEY, JR.
1960-1981

October 23, 2015

Ms. Luly E. Massaro
Commission Clerk
RI Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: National Grid's Rate Design Plan
Docket No.: 4568

Dear Ms. Massaro:

Enclosed for filing on behalf of Wal-Mart Stores East, LP and Sam's East, Inc. is an original and ten copies of the Direct Testimony and Exhibits of Steve W. Chriss.

Very truly yours,

Melissa M. Horne

MMH:dch

Enclosure

cc: Atty. Leo Wold, Dept. of Attorney General
Docket 4568 Service List

Higgins, Cavanagh & Cooney, LLP

123 Dyer Street, Providence, RI 02903 | Phone: 401-272-3500 | Fax: 401-273-8780 | www.hcc-law.com

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: NATIONAL GRID'S RATE DESIGN PLAN

DOCKET NO. 4568

DIRECT TESTIMONY AND EXHIBITS OF STEVE W. CHRISS

ON BEHALF OF

WAL-MART STORES EAST, LP,

AND

SAM'S EAST, INC.

Filed: October 23, 2015

1	Contents	
2	Introduction.....	1
3	Purpose of Testimony and Summary of Recommendations.....	3
4	Summary of National Grid’s Proposal for Large Customers.....	4
5	Proposed G-32 and G-62 Consolidation	5
6	Table 1. Illustrative Consolidation Rebalancing Rates, Revenue Requirement of \$774,000.	10
7	National Grid’s Proposed G-32 Rate Design.....	10
8	Table 2. G-32 Customer, Demand, and Energy Charge Revenue Requirements at Cost of Service	
9	Levels, Existing G-32 Levels, and Proposed G-32 Levels.	12
10		
11	Exhibits	
12	Exhibit SWC-1 – Witness Qualifications Statement	
13	Exhibit SWC-2 – Summary of the Company’s Allocated Cost of Service Study Results for G-32 and G-	
14	62	
15	Exhibit SWC-3 – Revenue Requirement, Billing kWh, and Billing Demand, Existing G-32 vs. Proposed	
16	G-32	
17	Exhibit SWC-4 – National Grid’s Response to WMT 1-1	
18	Exhibit SWC-5 – Calculation of Illustrative Consolidation Rebalancing Rates	
19		

1 **Introduction**

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

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

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

7 A. I am testifying on behalf of Wal-Mart Stores East, LP and Sam's East, Inc.
8 ("Walmart").

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

10 A. In 2001, I completed a Master of Science in Agricultural Economics at Louisiana State
11 University. From 2001 to 2003, I was an Analyst and later a Senior Analyst at the
12 Houston office of Econ One Research, Inc., a Los Angeles-based consulting firm. My
13 duties included research and analysis on domestic and international energy and
14 regulatory issues. From 2003 to 2007, I was an Economist and later a Senior Utility
15 Analyst at the Public Utility Commission of Oregon in Salem, Oregon. My duties
16 included appearing as a witness for PUC Staff in electric, natural gas, and
17 telecommunications dockets. I joined the energy department at Walmart in July
18 2007 as Manager, State Rate Proceedings, and was promoted to my current position
19 in June 2011. My Witness Qualifications Statement is included herein as Exhibit
20 SWC-1.

1 Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE RHODE ISLAND
2 PUBLIC UTILITIES COMMISSION ("THE COMMISSION")?

3 A. No.

4 Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE
5 REGULATORY COMMISSIONS?

6 A. Yes. I have submitted testimony in over 135 proceedings before 36 other utility
7 regulatory commissions and before the Missouri House Committee on Utilities, the
8 Missouri Senate Veterans' Affairs, Emerging Issues, Pensions, and Urban Affairs
9 Committee, and the Kansas House Standing Committee on Utilities and
10 Telecommunications. My testimony has addressed topics including, but not limited
11 to, cost of service and rate design, revenue requirement, ratemaking policy,
12 qualifying facility rates, telecommunications deregulation, resource certification,
13 energy efficiency/demand side management, fuel cost adjustment mechanisms,
14 decoupling, and the collection of cash earnings on construction work in progress.

15 Q. ARE YOU SPONSORING ANY EXHIBITS WITH YOUR TESTIMONY?

16 A. Yes. I am sponsoring the exhibits listed in the Table of Contents.

17 Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN RHODE ISLAND.

18 A. Walmart operates 10 retail units and employs 2,590 associates in Rhode Island. In
19 fiscal year ending 2015, Walmart purchased \$297.8 million worth of goods and
20 services from Rhode Island-based suppliers, supporting 10,129 supplier jobs.¹

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

1 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS WITHIN THE COMPANY'S**
2 **SERVICE TERRITORY.**

3 A. Walmart has approximately 9 stores and related facilities that take service from The
4 Narragansett Electric Company d/b/a National Grid ("National Grid" or "the
5 Company"), primarily on the Large Demand ("G-32") schedule.

6

7 **Purpose of Testimony and Summary of Recommendations**

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

9 A. The purpose of my testimony is to respond to the Company's rate design review
10 filling pursuant to Rhode Island General Laws § 39-26.6-24. I provide
11 recommendations to assist the Commission in its thorough and careful consideration
12 of the Company's proposed changes to its rates and tariffs.

13 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS TO THE COMMISSION.**

14 A. My recommendations to the Commission are as follows:

15 1) If the Commission approves the Company's proposed consolidation of G-32
16 and Optional Large Demand ("G-62"), the Commission should approve
17 consolidation rebalancing rates, as discussed in this testimony, in the new G-
18 32 rate schedule to fully relieve existing G-32 customers of the burden of the
19 subsidy payment to G-62 customers currently built in to G-32 rates.

20 2) The Commission should set new G-32 rates such that the customer and
21 demand charges are set at their full cost of service levels and eliminate the
22 schedule's energy charge. If the Commission determines that lesser

1 movement towards cost is appropriate, the Commission should, at a
2 minimum, accept the Company's proposed G-32 rate design structure and
3 require the Company to file a full cost of service G-32 rate design in its next
4 base rate case.

5 The fact that an issue is not addressed herein or in related filings should
6 not be construed as an endorsement of any filed position.

7
8 **Summary of National Grid's Proposal for Large Customers**

9 **Q. PLEASE DEFINE "LARGE CUSTOMER."**

10 A. For the purposes of this docket, "large customer" means customers currently taking
11 service from the Company on G-32, G-62, Large Demand Back-up Service ("B-32"), or
12 Optional Large Demand Back-up Service ("B-62").

13 **Q. WHAT IS YOUR UNDERSTANDING OF NATIONAL GRID'S PROPOSALS IN THIS**
14 **DOCKET FOR LARGE CUSTOMERS?**

15 A. My understanding of the Company's proposals for large customers is as follows:

- 16 1) Consolidate G-32 and G-62 into one set of rates applicable to all
17 customers currently served under G-32 and G-62;
- 18 2) Restructure the rate design for G-32; and
- 19 3) Eliminate B-62 and change the charges in B-32 to align with the
20 Company's proposed changes for G-32. See Direct Testimony of Peter T.
21 Zschokke and Jeanne A. Lloyd, page 57, line 6 to page 59, line 11.

1 **Q. DO YOU HAVE CONCERNS WITH THE COMPANY'S PROPOSALS?**

2 A. Yes. I have concerns regarding the Company's proposed consolidation of G-32 and
3 G-62 and the Company's proposed G-32 rate design.

4
5 **Proposed G-32 and G-62 Consolidation**

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

8 A. Walmart advocates that rates be set based on the utility's cost of service for each
9 rate class. This produces equitable rates that reflect cost causation, send proper
10 price signals, and minimize price distortions.

11 **Q. HAS THE COMPANY INCLUDED AN EXAMINATION OF ITS CLASS COST OF SERVICE**
12 **STUDY ("ACOSS") RESULTS AND REVENUE ALLOCATION AS PART OF ITS FILING?**

13 A. Yes. See Schedule NG-10.

14 **Q. WHAT METRIC CAN BE USED TO DETERMINE IF RATES ACCURATELY REFLECT THE**
15 **UNDERLYING COST OF SERVICE?**

16 A. The relative rate of return (RROR), which is a measure of the relationship of the rate
17 of return for an individual rate class to the total system rate of return. A RROR
18 greater than 1.0 means that the rate class is paying rates in excess of the costs
19 incurred to serve that class, and a RROR less than 1.0 means that the rate class is
20 paying rates less than the costs incurred to serve that class. As such, those rate
21 classes with a RROR greater than 1.0 shoulder some of the revenue responsibility
22 burden for the classes with a RROR less than 1.0.

1 **Q. IS THE CURRENT G-62 REVENUE REQUIREMENT SET AT ITS COST OF SERVICE LEVEL?**

2 A. No. As indicated by the Company's ACOSS results, the current G-62 revenue
3 requirement, per compliance in Docket No. 4323, is set such that the Company
4 experiences a negative return on rate base – essentially loses money – on G-62
5 distribution sales. The return on distribution rate base for G-62 is -6.06%, or a RROR
6 of (0.85), and the rate schedule receives a subsidy paid by other rate classes of \$2.8
7 million. *Id.*, column (f), line 42 and line 56 and Exhibit SWC-2, (R7).

8 **Q. IS THE CURRENT G-32 REVENUE REQUIREMENT SET AT ITS COST OF SERVICE LEVEL?**

9 A. No. As indicated by the Company's ACOSS results, the current G-32 revenue
10 requirement is set such that G-32 customers pay rates that collect revenues in
11 excess of the Company's cost to serve the rate schedule. The return on distribution
12 rate base for G-32 is set at 9.52 percent, whereas the total company return on rate
13 base is 7.17 percent, for a RROR of 1.33. The revenue requirement for G-32 also
14 includes \$939,000 of the re-allocation of revenue shortfalls for classes such as G-62,
15 for whom rates have been set below cost of service. See Schedule NG-10, column
16 (e), line 43 and line 56 and Exhibit SWC-2, (R7).

17 While the ACOSS does not specify which classes subsidize which other
18 classes, because the subsidy paid by G-32 is lower than the subsidy received by G-62,
19 for the purposes of my testimony I treat the entire G-32 payment as going to G-62
20 customers.

1 Q. ARE THERE IMPLICATIONS FOR EXISTING G-32 CUSTOMERS FROM THE PROPOSED
2 CONSOLIDATION OF G-32 AND G-62?

3 A. Yes. There are two significant and countervailing implications for G-32 customers.
4 In total, existing G-32 customers appear to be worse off if the Commission approves
5 the consolidation without a remedy for those customers included in the resulting
6 rates.

7 Q. WHAT IS THE FIRST IMPLICATION OF THE CONSOLIDATION FOR EXISTING G-32
8 CUSTOMERS?

9 A. The first implication is that the consolidation does not *explicitly* account for the
10 subsidy paid by existing G-32 customers to G-62 customers. As stated above,
11 existing G-32 customers are currently paying rates approximately \$939,000 in excess
12 of the Company's cost to serve them. These customers will take on the legacy of the
13 subsidization of G-62 rates and, to compound matters, face additional rate increase
14 exposure in the Company's next base rate case.

15 Performing a high level analysis using National Grid's ACOSS results², it
16 appears that the combined G-32/G-62 rate class could pay rates below the
17 Company's cost to serve the combined class. See Exhibit SWC-2, (R7). If the
18 Company's ACOSS in their next rate case produces similar results, the Commission
19 could take action in the next base rate case to correct the revenue deficiency. If the
20 Commission takes action, existing G-32 customers would face an above average

² National Grid did not perform an updated ACOSS for this docket and indicated in a discovery response that they are not able to manipulate the results of the study used in Docket No. 4323 without consultant assistance.

1 increase when the alternative, were the G-32 and G-62 rates not consolidated,
2 would likely result in an at- or below-average increase.

3 **Q. WHAT IS THE SECOND IMPLICATION OF THE CONSOLIDATION?**

4 A. The second implication is that the consolidation does *implicitly* account for some,
5 but not all, of the subsidy paid by existing G-32 customers to G-62 customers. This
6 is driven by two factors.

7 **Q. WHAT IS THE FIRST FACTOR?**

8 A. The first factor is that the consolidation of the rates will increase the revenue
9 requirement of G-32 by approximately \$5.4 million³, or 14.7 percent, which is a
10 subsidized amount, not a full cost of service amount. See Exhibit SWC-3 and
11 Schedule NG-10, column (f), line 27.

12 **Q. WHAT IS THE SECOND FACTOR?**

13 A. The addition of G-62 load to the G-32 schedule will increase the billing determinants
14 used to set rates proportionally higher than the increase in revenue requirement. As
15 proposed, the consolidation would add over 23 percent more billing kWh and over
16 19 percent more billing kW to the rate schedule, versus 14.7 percent of additional
17 revenue. *Id.* The proportionally larger increase in billing determinants than revenue
18 requirement will dilute the impact of the revenue requirement increase as it is
19 spread over more billing units.

³ The current rate designs for G-32 and G-62 would over-collect the revenue requirement of the consolidated rate schedules. The value of \$5.4 million is based on the Company's proposed consolidated revenue requirement versus the current standalone G-32 revenue requirement.

1 As a result, the rates necessary to collect the revenue requirement of the
2 consolidated schedule are lower than they would have been had the Company kept
3 the existing G-32 rate as a standalone rate and set the customer, demand, and
4 energy charges to collect the respective portions of revenue requirement as
5 proposed by the Company for the consolidated rate.

6 **Q. HAS THE COMPANY ESTIMATED THE VALUE OF THIS COST REDUCTION TO**
7 **EXISTING G-32 CUSTOMERS?**

8 A. Yes. The Company estimates that current G-32 customers would benefit from the
9 consolidation by approximately \$165,000. *See* Exhibit SWC-4.

10 **Q. DOES THE RATE DESIGN BENEFIT DISCUSSED ABOVE COVER THE ENTIRETY OF THE**
11 **SUBSIDY PAID BY EXISTING G-32 CUSTOMERS TO EXISTING G-62 CUSTOMERS?**

12 A. No, there is a difference of approximately \$774,000. *See* Exhibit SWC-5. As such,
13 the Commission should approve a remedy to properly consolidate the two
14 schedules.

15 **Q. WHAT REMEDY WOULD BE APPROPRIATE?**

16 A. An appropriate remedy would be a rate mechanism incorporated into the new G-32
17 rate that fully relieves existing G-32 customers of the burden of the subsidy payment
18 to G-62 customers (referred to hereafter as "consolidation rebalancing rates"). This
19 rate mechanism would be set so that it would be revenue neutral to the Company
20 and applied as a charge to existing G-62 customers and a credit to existing G-32
21 customers. This mechanism would continue until the effective date of rates
22 approved in the Company's next base rate case, when new rates can be approved

1 for the consolidated class based on the approved cost of service study in that
2 docket.

3 **Q. HAVE YOU CALCULATED THE ILLUSTRATIVE CONSOLIDATION REBALANCING**
4 **RATES?**

5 **A.** Yes, as shown in Table 1.

	B-32/G-32 Credit	B-62/G-62 Charge
Credited or Billed on a /kWh Basis	(\$0.000348)/kWh	\$0.001474/kWh
Credited or Billed on a /kW Basis	(\$0.124)/kW	\$0.67/kW

Source: Exhibit SWC-5.

6
7 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION ON THIS ISSUE?**

8 **A.** If the Commission approves the consolidation of G-32 and G-62, the Commission
9 should approve consolidation rebalancing rates in the consolidated G-32 rate to fully
10 relieve existing G-32 customers of the burden of the subsidy payment to G-62
11 customers.

12
13 **National Grid's Proposed G-32 Rate Design**

14 **Q. WHAT IS YOUR UNDERSTANDING OF THE CURRENT STRUCTURE OF SCHEDULE G-32**
15 **DISTRIBUTION RATES?**

16 **A.** My understanding of the current structure of the G-32 distribution rates is that they
17 contain the following charges:

- 18 1) A \$825/customer-month customer charge, which includes recovery of costs
19 related to the first 200 kW of billed demand;

1 2) A \$4.10/kW distribution demand charge for all demand in excess of 200
2 billed kW, subject to a 75 percent ratchet using the preceding eleven billing
3 months; and

4 3) A \$0.00718/kWh distribution energy charge. See R.I.P.U.C. No. 2147, Sheet 1
5 and
6 https://www.nationalgridus.com/narragansett/business/rates/4_g32.asp.

7 **Q. WHAT CHANGES TO THE G-32 RATE DESIGN DOES NATIONAL GRID PROPOSE?**

8 A. The Company proposes the following changes to G-32:

- 9 1) Decrease the customer charge to \$215/customer-month;
- 10 2) Remove recovery of demand costs from the customer charge and increase
11 the distribution demand charge to \$4.50/kW for *all* kW; and
- 12 3) Reduce the distribution energy charge to \$0.0023/kWh. See Direct
13 Testimony of Peter T. Zschokke and Jeanne A. Lloyd, page 58, line 1 to line
14 10.

15 **Q. DO THE COMPANY'S PROPOSED CHANGES MOVE G-32 CHARGES CLOSER TO THEIR**
16 **COST OF SERVICE LEVELS?**

17 A. Yes. An examination of the Company's ACROSS unit cost data for G-32, as
18 summarized in Table 2, show that approximately 6.4 percent of costs incurred are
19 customer-related and approximately 93.6 percent are distribution demand-related.
20 The existing G-32 rates do not reflect underlying cost causation, particularly because
21 a large portion of the schedule's revenue requirement is recovered through a \$/kWh
22 energy charge and the Company incurs no distribution costs for the schedule on a

1 \$/kWh basis. In its G-32 proposal, the Company reduces the schedule's revenue
2 requirement recovered through the energy charge as well as generally aligns the
3 customer charge revenue requirement with its cost of service level.

Table 2. G-32 Customer, Demand, and Energy Charge Revenue Requirements at Cost of Service Levels, Existing G-32 Levels, and Proposed G-32 Levels.

	Cost of Service	Existing G-32	Proposed G-32 ⁴
Customer Revenue Requirement	6.4%	28.6%	6.6%
Demand Revenue Requirement	93.6%	37.9%	79.6%
Energy Revenue Requirement	0.0%	33.5%	15.1%

Sources: Schedule NG-12, page 4.

4

5 **Q. DOES THE COMPANY PROVIDE AN EXPLANATION AS TO WHY THEY CHOSE TO NOT**
6 **PROPOSE A FULL COST DEMAND CHARGE AND TO ELIMINATE THE ENERGY**
7 **CHARGE, AS PART OF THE G-32 RATE DESIGN?**

8 A. Yes. The Company designed the changes to limit the bill impacts to individual
9 customers. See Direct Testimony of Peter T. Zschokke and Jeanne A. Lloyd, page 12,
10 line 13 to line 14.

11 **Q. EVEN WITH THE COMPANY'S PROPOSED CHANGES DESCRIBED ABOVE, DO YOU**
12 **HAVE A CONCERN WITH THE COMPANY'S PROPOSED G-32 RATE DESIGN?**

13 A. Yes. The proposed rate design for G-32 is a concern, especially for high load factor
14 customers, as the schedule will continue to recover demand-related costs through
15 the energy charge.

⁴ These percentages do not sum to 100 percent to account for the revenue requirement impact of the billing credits and discounts contained in the G-32 schedule.

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

3 A. Yes. The shift of distribution demand costs from per kW demand charges to per
4 kWh energy charges results in a shift in demand cost responsibility from lower load
5 factor customers to higher load factor customers, who are more efficiently utilizing
6 Company facilities. In essence, two customers can have the same level of demand
7 and cause the utility to incur the same amount of fixed cost, but because one
8 customer uses more kWh than the other, that customer will pay more of the
9 demand cost than the customer that uses fewer kWh. This results in misallocation
10 of cost responsibility as higher load factor customers overpay for the demand-
11 related costs incurred by the Company to serve them and are essentially penalized
12 for more efficiently using the Company's system.

13 Q. CAN YOU PROVIDE A GENERAL ILLUSTRATION OF A SHIFT IN DEMAND COST
14 RESPONSIBILITY?

15 A. Yes. To provide my illustration, I assume the following:

16 a) A utility has only two customers (Customer 1 and Customer 2), with
17 individual monthly peak demands of 20 kW for a total monthly system load
18 of 40 kW.

19 b) The annual revenue requirement or cost to the utility associated with the
20 investment for the 40 kW infrastructure is \$2,000, and the entire cost will be
21 collected each year, so each customer has caused the utility to incur \$1,000
22 of demand-related or fixed costs.

1 c) Customer 1 has a monthly demand of 20 kW and a load factor of 60 percent
2 and thus consumes 105,120 kWh/year (20 kW * 0.6 * 8760).

3 d) Customer 2 has a monthly demand of 20 kW and load factor of 30 percent
4 and thus consumes 52,560 kWh/year (20 kW * 0.3 * 8760).

5 **Q. IF THE DEMAND-RELATED COSTS WERE CHARGED ON A PER KW BASIS, WHAT**
6 **WOULD THE PER KW CHARGE BE?**

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

10 **Q. IF THE DEMAND-RELATED COSTS WERE CHARGED ON A PER KWH BASIS, WHAT**
11 **WOULD THE PER KWH CHARGE BE?**

12 A. If the utility were to charge the demand-related costs on a per kWh basis, the energy
13 charge would be 1.27 cents/kWh (or $\$0.0127/\text{kWh}$). This is calculated as follows:
14 $\$2,000 / 157,680 \text{ kWh}$, using total company sales (i.e., the sum of the two
15 customers' annual kWh usage) as the denominator.

16 **Q. WHAT WOULD EACH CUSTOMER PAY UNDER THE PER KWH CHARGE?**

17 A. Customer 1, who caused the utility to incur \$1,000 in demand-related costs, with a
18 load factor of 60 percent and an annual usage of 105,120 kWh, would pay \$1,333
19 ($\$0.0127/\text{kWh} * 105,120 \text{ kWh}$). Customer 2, who also caused the utility to incur
20 \$1,000 in demand-related costs, with a load factor of 30 percent and an annual
21 usage of 52,560 kWh, would pay \$667 ($\$0.0127/\text{kWh} * 52,560$).

1 **Q. IS THIS AN EQUITABLE RESULT?**

2 A. No. Even though each customer caused the utility to incur \$1,000 in costs, the utility
3 will be over-recovering from one customer and under-recovering from the other.
4 Under the per kWh scenario, the utility would over-recover from Customer 1, the
5 higher load factor customer, by \$333 (i.e. \$1,333 in revenues minus \$1,000 in costs),
6 and under-recover from Customer 2, the lower load factor customer, by \$333 (i.e.
7 \$667 in revenues minus \$1,000 in costs).

8 **Q. WHAT IS YOUR RECOMMENDATION TO THE COMMISSION ON THIS ISSUE?**

9 A. The Commission should set G-32 rates such that the customer and demand charges
10 are set at their full cost of service levels and eliminate the schedule's energy charge.
11 If the Commission determines that lesser movement towards cost is appropriate,
12 the Commission should, at a minimum, accept the rate design structure proposed
13 for G-32, and require the Company to file a full cost of service G-32 rate design in its
14 next base rate case.

15 **Q. IS THIS YOUR RECOMMENDATION REGARDLESS OF WHETHER OR NOT THE**
16 **COMMISSION APPROVES THE COMPANY'S PROPOSED CONSOLIDATION OF G-32**
17 **AND G-62?**

18 A. Yes.

19 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

20 A. Yes.

Wal-Mart Stores East, LP and Sam's East, Inc.
Direct Testimony of Steve W. Chriss
Rhode Island Docket No. 4568

Exhibit SWC - 1

Witness Qualifications Statement

Steve W. Chriss

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

EXPERIENCE

July 2007 – Present
Wal-Mart Stores, Inc., Bentonville, AR
Senior Manager, Energy Regulatory Analysis (June 2011 – Present)
Manager, State Rate Proceedings (July 2007 – June 2011)

June 2003 – July 2007
Public Utility Commission of Oregon, Salem, OR
Senior Utility Analyst (February 2006 – July 2007)
Economist (June 2003 – February 2006)

January 2003 - May 2003
North Harris College, Houston, TX
Adjunct Instructor, Microeconomics

June 2001 - March 2003
Econ One Research, Inc., Houston, TX
Senior Analyst (October 2002 – March 2003)
Analyst (June 2001 – October 2002)

EDUCATION

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

TESTIMONY BEFORE REGULATORY COMMISSIONS

2015

Oklahoma 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.

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

New York 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 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 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.

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.

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

Arkansas 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 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 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.

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

Kansas 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.

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.

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.

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.

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 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-EL: In Re: Petition for Rate Increase by Florida Power & Light Company.

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

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

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

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

New Jersey Board of Public Utilities Docket No. ER11080469: In the Matter of the Petition of Atlantic City Electric for Approval of Amendments to Its Tariff to Provide for an Increase in Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1 and For Other Appropriate Relief.

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

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

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

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

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

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

2011

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

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

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

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

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

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

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

reflect changes in the cost of capital, depreciation rates and cost of service, and for relief properly related thereto.

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

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

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

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

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

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

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

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

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

2010

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

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

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

Wal-Mart Stores East, LP and Sam's East, Inc.
Exhibit SWC-1
Rhode Island Docket No. 4568

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.

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.

Wal-Mart Stores East, LP and Sam's East, Inc.
Exhibit SWC-1
Rhode Island Docket No. 4568

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

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

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

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

2009

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

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

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

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

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

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

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

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

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

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

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

2008

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

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

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

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

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

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

2007

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

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

2006

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

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

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

2005

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

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

2004

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

TESTIMONY BEFORE LEGISLATIVE BODIES

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, 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.

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.

Exhibit SWC - 2

Summary of the Company's Allocated Cost of Service Study Results for G-32 and G-62

Summary of the Company's Allocated Cost of Service Study Results for G-32 and G-62

	G-32 (C1)	G-62 (C2)	Estimated Total (C2) + (C3)
(R1) Rate Base	(\$000) \$ 77,651	\$ 19,545	\$ 97,196
(R2) Compliance Rate of Return	(%) 7.17%	7.17%	7.17%
(R3) (R1) x (R2) Return on Rate Base, Cost of Service	(\$000) \$ 5,568	\$ 1,401	\$ 6,969
(R4) Return on Rate Base, Compliance Rates	(%) 9.52%	-6.06%	
(R5) (R1) x (R4) Return on Rate Base, Compliance Rates	(\$000) \$ 7,392	\$ (1,184)	\$ 6,208
(R6) (R5) / (R1) Merged Return on Rate Base, Compliance Rates	(%)		6.39%
(R7) Relative Rate of Return	1.33	(0.85)	0.89

Source:
 Schedule NG-10

Exhibit SWC - 3

Revenue Requirement, Billing kWh, and Billing
Demand, Existing G-32 vs. Proposed G-32

Revenue Requirement, Billing kWh, and Billing Demand, Existing G-32 vs. Proposed G-32

	G-32 (1)	G-62 (2)	Total (Current) (3) (1) + (2)	Difference (Current) (4) (2) / (1)	Total (Proposed) (5)	Difference (Proposed) (6) (5) - (1)	Difference (Proposed) (7) (6) / (1)
Requirement	\$ 36,597,535	\$ 5,743,240	\$ 42,340,775	15.7%			
Proposed Consolidated Revenue Requirement					\$ 41,986,564	\$ 5,389,029	14.7%
Billing kWh	2,221,229,723	525,192,409	2,746,422,132	23.6%			
Billing Demand	6,262,800	1,241,099	7,503,899	19.8%			

Source:
 Schedule NG-12, page 4

Exhibit SWC - 4

National Grid's Response to WMT 1-1

In Re: Review of Electric Distribution Rate Design
Pursuant to R.I. Gen. Laws § 39-26.6-24
Responses to Wal-Mart Stores East, LP and Sam's East, Inc.'s First Set of Data Requests
Issued on September 9, 2015

WMT 1-1

Request:

Please see Schedule NG-12. Please calculate customer, energy, and demand charges for G-32 as a standalone, non-consolidated rate using the proposed percentage of revenue requirement.

Response:

Attachment WMT 1-1, page 1, is a summary of the total combined class revenue based on the proposed rates for the combined rate class applied to each individual class's billing units. The detail of the revenue calculation is shown on page 2 of Attachment WMT 1-1. Page 1, lines 1 through 11, prices out each rate class's billing determinants at the rates proposed in the Company's filing. Page 1, line 13 is the design revenue for each rate class from the Company's last rate case (i.e., the revenue requirement that forms the basis of each rate class's current rates). As shown on line 15, Rate G-32 customers benefit slightly from the consolidation of the two classes by approximately \$165,000. If the rate classes were not consolidated and each rate class's rates were designed to recover the design revenue shown on Line 13, the Rate G-32 per-kWh charge would need to increase by \$0.00007 per kWh, as calculated on Line 19.

Exhibit SWC - 5

Calculation of Illustrative Consolidation Rebalancing Rates

Calculation of Illustrative Consolidation Rebalancing Rates

(1)		Subsidy Paid by G-32 to G-62	\$	939,000
(2)		Rate Design Offset	\$	(165,000)
(3)	(1) + (2)	Consolidation Rebalancing Revenue Requirement	\$	774,000
		If Billed on a kWh Basis:		
(4)		B-32/G-32 kWh		2,221,229,723
(5)	(3) / (4) x -1	B-32/G-32 Credit	\$	(0.000348)
(6)		B-62/G-62 kWh		525,192,409
(7)	(3) / (6)	B-62/G-62 Charge	\$	0.001474
		If Billed on a kW Basis:		
(8)		B-32/G-32 kW		6,261,716
(9)	(3) / (8) x -1	B-32/G-32 Credit	\$	(0.124)
(10)		B-62/G-62 kW		1,155,280
(11)	(3) / (10)	B-62/G-62 Charge	\$	0.67

Wal-Mart Stores East, LP and Sam's East, Inc.
Direct Testimony of Steve W. Chriss
Rhode Island Docket No. 4568

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2015 a copy of the cover letter and all materials accompanying this certificate were electronically transmitted to the parties listed on the Docket 4568 Service List as of October 14, 2015, and that the original and ten (10) copies were filed with the Commission Clerk of the RI Public Utilities Commission.


