





BEFORE THE  
RHODE ISLAND PUBLIC UTILITIES COMMISSION

\_\_\_\_\_) )  
THE NARRAGANSETT ELECTRIC ) )  
COMPANY D/B/A NATIONAL GRID ) )  
– PROPOSED POWER SECTOR ) DOCKET NO. 4780  
TRANSFORMATION VISION AND ) )  
IMPLEMENTATION PLAN ) )  
\_\_\_\_\_) )

Direct Testimony of Ali Al-Jabir

1 Introduction

2 Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

3 A My name is Ali Al-Jabir and my business address is 5151 Flynn Parkway, Suite 412  
4 C/D, Corpus Christi, Texas, 78411.

5 Q WHAT IS YOUR OCCUPATION?

6 A I am an energy advisor and an Associate in the field of public utility regulation with the  
7 firm of Brubaker & Associates, Inc. (“BAI”).

8 Q PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

9 A These are set forth in Appendix A to my testimony.

10 Q ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

11 A I am testifying on behalf of the United States Department of the Navy (“Navy”). The  
12 Navy is a large consumer of electricity in the service territory of the Narragansett

1 Electric Company d/b/a National Grid (“National Grid” or “Company”) and takes service  
2 from the Company primarily on Rate Schedule G-62. The Navy represents the Federal  
3 Executive Agencies (“FEA”) for issues related to National Grid.

4 **Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

5 A My testimony addresses certain components of the Power Sector Transformation  
6 Vision and Implementation (“PST”) Plan proposed by the National Grid in this  
7 proceeding before the Rhode Island Public Utilities Commission (“Commission”).  
8 Specifically, I address certain cost allocation and rate design aspects of National Grid’s  
9 proposal, along with the proposed performance incentives for achieving PST Plan  
10 goals. The fact that I am not addressing a specific issue in the Company’s application  
11 in this proceeding should not be construed as an endorsement of the Company’s  
12 position with regard to such issues.

13 **Q PLEASE SUMMARIZE YOUR CONCLUSIONS AND RECOMMENDATIONS.**

14 A My conclusions and recommendations can be summarized as follows:

- 15 1. The proposed PST rider would permit dollar for dollar recovery of incremental PST  
16 Plan costs outside of a base rate case. This raises piecemeal ratemaking concerns  
17 because the Company’s proposal would permit recovery of incremental cost  
18 increases between rate cases without considering the impact of offsetting cost  
19 reductions or revenue increases on the Company’s overall cost of service.  
20 Therefore, the Commission should reject National Grid’s request to use a rider to  
21 recover PST Plan costs. Instead, the Commission should require the Company to  
22 seek recovery of any such PST Plan costs in the context of a base rate proceeding.
- 23 2. Large customers on National Grid’s system should not be required to pay a share  
24 of certain categories of PST Plan expenditures, such as advanced metering  
25 investments, if the benefit of such investments flows exclusively to other customer  
26 classes. Therefore, the Commission should require National Grid to directly assign  
27 the cost of PST Plan initiatives to individual rate classes when they are the only  
28 beneficiaries of such PST Plan investments.
- 29 3. National Grid proposes to spread incremental PST Plan costs that are associated  
30 with investments that are outside of the Company’s core operations to all customers  
31 on an equal cents per kWh basis. From a cost allocation and rate design

1 perspective, it is more appropriate to allocate and to recover such PST Plan costs  
2 on a per kW (demand) basis from customer classes who possess demand  
3 metering. Consequently, I recommend that the Commission require the Company  
4 to allocate such PST Plan costs on a demand basis and to recover such costs on  
5 a per kW (demand) basis from all large customer classes who have demand meters  
6 in place.

7 4. The Commission should reject National Grid's proposed PST Plan return on equity  
8 ("ROE") performance incentives. The Company does not merit and should not  
9 receive an ROE performance bonus under the proposed PST Plan simply for  
10 meeting its obligations under the regulatory compact.

11 5. The additional rate uncertainty created by the PST Plan performance incentive  
12 mechanism would adversely impact customers by exposing them to a higher level  
13 of financial risk, making it more difficult for them to manage their energy budgets  
14 and to plan for future power requirements.

15 6. National Grid's proposed performance incentive structure is unreasonable because  
16 it incorporates provisions for ROE shareholder rewards for exceeding the  
17 performance targets but does not include potential shareholder penalties for failing  
18 to meet these targets.

19 7. If the Commission permits the Company to recover performance incentives  
20 associated with the PST Plan, it should implement a balanced incentive structure  
21 that provides shareholder rewards for exceeding the established performance  
22 targets but that also imposes symmetrical financial penalties on National Grid's  
23 shareholders for failure to meet the targets.

## 24 **Overview of the PST Plan**

25 **Q HAVE YOU REVIEWED THE PST PLAN FILED BY THE COMPANY IN THIS**  
26 **PROCEEDING?**

27 **A** Yes.

28 **Q PLEASE SUMMARIZE THE MAJOR COMPONENTS OF THE PST PLAN.**

29 **A** The PST Plan is a multi-component plan that is intended to prepare the Company's  
30 grid for electric industry trends towards decentralized energy supply, cleaner energy  
31 sources and increased digitization of the power grid driven by technological advances.

32 The Company asserts that many of the initiatives in the PST Plan are the product of a

1 collaborative stakeholder process. The major components of the PST Plan include the  
2 following:

- 3 1. Grid modernization investments;
- 4 2. Implementing advanced metering functionality;
- 5 3. An electric heat initiative;
- 6 4. An electric transportation initiative;
- 7 5. Proposals to implement energy storage and solar demonstration programs; and
- 8 6. A rewards program for income-eligible customers.

9 As part of the PST Plan, the Company also seeks the Commission's approval to  
10 implement a performance incentive mechanism that would reward the Company with  
11 additional ROE basis points for achieving specific performance targets that are tied to  
12 each component of the PST Plan.

13 **Q WHAT ARE THE MAJOR COST ALLOCATION AND RATE DESIGN COMPONENTS**  
14 **OF THE PST PLAN PROPOSAL?**

15 A National Grid seeks approval to implement a PST rider that would authorize the  
16 Company to recover its incremental capital and operating expenditures associated with  
17 the PST Plan, along with any associated performance rewards, between rate cases.  
18 The PST rider would incorporate a reconciliation factor that would be designed to  
19 ensure dollar for dollar recovery of the incremental PST Plan costs.

20 The Company proposes to differentiate the class cost allocation and recovery  
21 of PST Plan costs by Plan component. The cost of PST Plan components that are  
22 directly related to the provision of delivery service, such as advanced metering  
23 investments, would be allocated in a fashion that mirrors the class allocation of similar  
24 costs in National Grid's most recent class cost of service study ("CCOSS"). Incremental  
25 PST Plan costs associated with investments that are outside of the Company's core

1 operations, such as the electric transportation initiative, the energy storage initiative  
2 and the solar demonstration programs, would be spread to all customers on an equal  
3 cents per kWh basis.

4 The Company is also seeking the Commission's approval to recover \$2 million  
5 in incremental operations and maintenance ("O&M") expenses associated with its  
6 advanced metering deployment initiative through its proposed PST Plan rider by  
7 October 1, 2018. More significantly, National Grid proposes to use the PST rider to  
8 recover much larger incremental costs associated with the PST Plan over time, as the  
9 Company incurs such costs. National Grid projects that, over the five fiscal years of  
10 2019 through 2023, the PST Plan would require total cash flows of up to \$329 million  
11 to support capital and O&M expenditures connected to Plan implementation under a  
12 Rhode Island only deployment scenario.<sup>1</sup>

### 13 **Issues of Concern with the PST Plan**

14 **Q DO YOU HAVE CONCERNS WITH CERTAIN COMPONENTS OF THE PST PLAN**  
15 **PROPOSAL?**

16 **A** Yes. The PST Plan filing raises a number of concerns. These concerns include the  
17 proposal to recover PST Plan costs through a dedicated rider, the proposed allocation  
18 of PST Plan costs to the customer classes, the rate design of the proposed PST rider  
19 and the proposal to reward the Company's shareholders with performance rewards for  
20 meeting certain PST Plan targets. I address each of these concerns below.

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<sup>1</sup>Docket No. 4780, Direct Testimony of National Grid's Power Sector Transformation Witness Panel, Attachment 1, page 102, January 12, 2018.

1    **Q     PLEASE DISCUSS YOUR CONCERNS REGARDING THE PROPOSED PST RIDER.**

2    A     The proposed PST rider would permit dollar for dollar recovery of incremental PST Plan  
3       costs outside of a base rate case. This raises piecemeal ratemaking concerns because  
4       the Company's proposal would permit recovery of incremental cost increases between  
5       rate cases without considering the impact of offsetting cost reductions or revenue  
6       increases on the Company's overall cost of service.

7    **Q     SHOULD THE COMMISSION APPROVE THE PROPOSED PST RIDER IN THIS**  
8       **PROCEEDING?**

9    A     No, the Commission should reject National Grid's request to use a rider to recover PST  
10     Plan costs. Instead, the Commission should require the Company to seek recovery of  
11     any such PST Plan costs in the context of a base rate proceeding.

12           As a matter of policy, the Commission should limit the use of riders and tracking  
13     mechanisms because they shift regulatory risk from the Company's investors to its  
14     customers. Moreover, such mechanisms allow the Company to recover certain  
15     components of its revenue requirement on a piece-meal basis, outside of a full base  
16     rate case. This would undermine the Commission's ability to evaluate the sufficiency  
17     of the Company's rates based on the totality of the utility's costs and revenues.

18   **Q     WHY SHOULD THE COMMISSION LIMIT THE RECOVERY OF COSTS OUTSIDE**  
19     **OF A BASE RATE CASE?**

20   A     To reflect changes in cost and revenue items in rates in a traditional base rate case,  
21     the Company must establish a base rate revenue deficiency through an examination of  
22     all of the utility's costs and revenues. To establish a base rate revenue deficiency, the  
23     Company must account for all of its costs and revenues, including both increases and  
24     reductions, since the time its base rates were last approved. This is accomplished by

1 taking a snapshot of all of the utility's costs and revenues for a designated test year,  
2 adjusted for known and measurable changes. In a full rate proceeding, no single cost  
3 or revenue item is singled out for guaranteed recovery.

4 The recognition of fluctuations in specific cost items through separate tracking  
5 mechanisms would circumvent the base ratemaking process by allowing the Company  
6 to adjust its rates for variations in these cost items without taking into account the  
7 possibility that increases in these costs items could be offset by reductions in other  
8 components of the Company's cost structure or increases in revenues. Therefore, the  
9 use of tracking mechanisms to recover fluctuations associated with specific cost items  
10 on an isolated basis could allow the Company to increase its rates and earn more than  
11 its authorized rate of return, without establishing a base rate revenue deficiency in a  
12 base rate proceeding.

13 **Q PLEASE EXPLAIN WHY RIDER MECHANISMS UNREASONABLY SHIFT RISK**  
14 **FROM UTILITY INVESTORS TO CUSTOMERS.**

15 A A policy that permits a utility to adjust its rates for individual cost items outside of a base  
16 rate case shifts regulatory risk from utility investors to customers by providing investors  
17 with accelerated recognition of specific cost adjustments in utility rates. Moreover, this  
18 change in the Company's risk profile would occur without a corresponding reduction to  
19 its rate of return to recognize the reduced business risks faced by the utility.

20 **Q WHAT ARE THE RAMIFICATIONS OF TRANSFERRING THIS REGULATORY RISK**  
21 **FROM INVESTORS TO RATEPAYERS?**

22 A When investors bear the risk of regulatory lag, the utility's management has a strong  
23 incentive to control cost escalations. This is the case because any cost increases  
24 damage the utility's bottom line until the next base rate case. When the risk of cost

1 increases between rate cases is shifted to customers through the use of rider  
2 mechanisms, the utility's motivation to control costs is significantly reduced. This  
3 change in the incentive structure can lead to higher rates for electricity customers over  
4 time.

5 **Q PLEASE DESCRIBE YOUR CONCERNS WITH NATIONAL GRID'S PROPOSED**  
6 **COST ALLOCATION AND RATE DESIGN OF THE PST RIDER.**

7 **A** National Grid proposes to allocate the cost of PST Plan components that are directly  
8 related to the provision of delivery service, such as advanced metering investments, in  
9 a fashion that mirrors the allocation of similar costs in National Grid's most recent  
10 CCOSS. While this approach may be reasonable for grid investments that broadly  
11 benefit the entire system, it appears that the Company is not proposing to directly  
12 assign the cost of PST Plan initiatives to individual rate classes when such rate classes  
13 are the only beneficiaries of specific Plan investments. This is problematic because  
14 certain PST Plan initiatives such as advanced metering functionality would be expected  
15 to narrowly benefit the residential and small commercial classes. In general, large  
16 customers such as those taking service under Rate G-62 already have advanced  
17 interval metering functionality at their locations and would therefore not be expected to  
18 benefit from such components of the PST Plan. Consequently, large customers should  
19 not be required to pay a share of such Plan investments when the benefits of such  
20 investments flow exclusively to other customer classes. Therefore, the Commission  
21 should require National Grid to directly assign the cost of PST Plan initiatives to  
22 individual rate classes when they are the only beneficiaries of certain PST Plan  
23 investments.

24 Moreover, National Grid proposes to spread incremental PST Plan costs that  
25 are associated with investments that are outside of the Company's core operations to

1 all customers on an equal cents per kWh basis. As noted above, examples of this  
2 approach include the proposed electric transportation initiative, the energy storage  
3 initiative and the solar demonstration programs. This approach ignores the fact that  
4 the cost of the Company's delivery service functions generally consist of fixed poles  
5 and wires investments that vary with the demands imposed on the system rather than  
6 the amount of energy consumption. Therefore, from a cost allocation and rate design  
7 perspective, it is more appropriate to allocate and to recover such PST Plan costs on  
8 a per kW (demand) basis from customer classes who possess demand metering.  
9 Consequently, I recommend that the Commission require the Company to allocate  
10 such PST Plan costs on a demand basis and to recover such costs on a per kW  
11 (demand) basis from all larger customer classes who have demand meters in place.

12 **Q DO YOU OBJECT TO THE COMPANY'S PROPOSED PST PLAN PERFORMANCE**  
13 **INCENTIVES?**

14 A Yes. National Grid's proposal incorporates ROE basis point incentives that are  
15 associated with meeting various performance targets that are linked to different  
16 components of the PST Plan. For example, the PST Plan includes proposed incentive  
17 rewards for meeting targets associated with certain aspects of providing  
18 interconnection support services to customers, including the accuracy of the  
19 interconnection cost estimates provided to customers and the amount of time required  
20 to provide the customer with an executable Interconnection Service Agreement.

21 This proposal is problematic because it would potentially allow the Company to  
22 earn an overall ROE that would be above the level needed to provide the Company  
23 with an opportunity to earn a reasonable rate of return on its operations. Moreover,  
24 such an ROE bonus is not justified in a regulated ratemaking context where the  
25 Company is undertaking these investments in order to satisfy its legal obligation to

1 provide quality delivery service to its customers and is recovering the cost of its grid  
2 investments, plus a reasonable rate of return, through regulated rates. In other words,  
3 the Company does not merit and should not receive an ROE performance bonus simply  
4 for meeting its obligations under the regulatory compact.

5 **Q DO YOU HAVE ANY ADDITIONAL CONCERNS WITH THE PROPOSED**  
6 **PERFORMANCE INCENTIVES?**

7 A Yes. The performance incentive mechanism would allow National Grid to impose rate  
8 increases on customers to recover the associated financial rewards. The magnitude  
9 of the awarded incentive would fluctuate, depending on the actual performance of the  
10 Company relative to the numerous different targets set forth in the PST Plan. The  
11 additional rate uncertainty created by this incentive mechanism would adversely impact  
12 customers by exposing them to a higher level of financial risk, making it more difficult  
13 for them to manage their energy budgets and to plan for future power requirements.

14 For the reasons set forth above, the Commission should reject National Grid's  
15 proposed PST Plan performance incentives.

16 **Q DO YOU ALSO OBJECT TO THE STRUCTURE OF THE PROPOSED**  
17 **PERFORMANCE INCENTIVES?**

18 A Yes. National Grid's proposed performance incentive structure is unreasonable  
19 because it incorporates provisions for ROE shareholder rewards for exceeding the  
20 performance targets but does not include potential shareholder penalties for failing to  
21 meet these targets. This asymmetrical approach is biased in favor of National Grid's  
22 shareholders at the expense of its customers. Therefore, if the Commission permits  
23 the Company to recover performance incentives associated with the PST Plan, it  
24 should implement a balanced incentive structure that provides shareholder rewards for

1 exceeding the established performance targets and also imposes symmetrical financial  
2 penalties on National Grid's shareholders for failure to meet the targets.

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

4 **A** Yes.

**Qualifications of Ali Al-Jabir**

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

2    A     Ali Al-Jabir. My business address is 5151 Flynn Parkway, Suite 412 C/D, Corpus  
3     Christi, Texas, 78411.

4    **Q     WHAT IS YOUR OCCUPATION AND BY WHOM ARE YOU EMPLOYED?**

5    A     I am a consultant in the field of public utility regulation with the firm of Brubaker &  
6     Associates, Inc. ("BAI").

7    **Q     PLEASE STATE YOUR EDUCATIONAL BACKGROUND.**

8    A     I am a graduate of the University of Texas at Austin ("UT-Austin"). I hold the degrees  
9     of Bachelor of Arts and Master of Arts in Economics, both from UT-Austin. I have also  
10    completed course work at Harvard University. I received my B.A. degree with highest  
11    honors, and I am a member of the Phi Beta Kappa Honor Society.

12   **Q     PLEASE STATE YOUR EXPERIENCE.**

13   A     I joined BAI in January 1997. My work consists of preparing economic studies and  
14    economic policy analysis related to investor-owned, cooperative, and municipal utilities.  
15    Prior to joining BAI, I was employed at the Public Utility Commission of Texas ("Texas  
16    Commission") since 1991, where I held various positions including Policy Advisor to  
17    the Chairman. As Policy Advisor, I advised the Chairman on policy decisions in  
18    numerous rate and rulemaking proceedings. In 1995, I advised the Texas Legislature  
19    on the development of the statutory framework for wholesale competition in the Electric  
20    Reliability Council of Texas ("ERCOT"), and I was involved in subsequent rulemakings

1 at the Texas Commission to implement wholesale open access transmission service in  
2 the region.

3 During my tenure at the Texas Commission and in my present capacity, I have  
4 reviewed and analyzed several electric utility base rate and fuel filings in Texas. I have  
5 also worked on utility rate, fuel, and merger proceedings and rulemakings in Virginia,  
6 Missouri, Colorado, Indiana, Alberta, Pennsylvania, North Carolina, South Carolina,  
7 Michigan and Nova Scotia. In addition to my work on such proceedings, I have drafted  
8 policy papers and comments regarding electric industry restructuring and competitive  
9 policy issues in Texas, Alabama, Louisiana, Georgia, and Delaware, as well as before  
10 the Federal Energy Regulatory Commission. I have been an invited speaker at several  
11 electric utility industry conferences, and I have presented seminars on utility regulation  
12 and industry restructuring.

13 BAI and its predecessor firms have been active in utility rate and economic  
14 consulting since 1937. The firm provides consulting services in the field of public utility  
15 regulation to many clients, including large industrial and institutional customers, some  
16 competitive retail power providers and utilities and, on occasion, state regulatory  
17 agencies. In addition, we have prepared depreciation and feasibility studies relating to  
18 utility service. We assist in the negotiation of contracts and the solicitation and  
19 procurement of competitive energy supplies for large energy users, provide economic  
20 policy analysis on industry restructuring issues, and present seminars on utility  
21 regulation. In general, we are engaged in regulatory consulting, economic analysis,  
22 energy procurement, and contract negotiation.

23 In addition to our main office in St. Louis, the firm also has branch offices in  
24 Corpus Christi, Texas and Phoenix, Arizona.

1    **Q     HAVE YOU PREVIOUSLY FILED TESTIMONY IN CONTESTED UTILITY**  
2           **PROCEEDINGS?**

3    A     Yes, I have filed written testimony in the following dockets:

- 4           1.    Texas Docket No. 10035 – Application of West Texas Utilities Company to  
5                Reconcile Fuel Costs and for Authority to Change Fixed Fuel Factors;
- 6           2.    Texas Docket No. 10200 – Application of the Texas - New Mexico Power  
7                Company for Authority to Change Rates;
- 8           3.    Texas Docket No. 10325 – Application of the Central Texas Electric Cooperative,  
9                Inc. for Authority to Change Rates;
- 10          4.    Texas Docket No. 10600 – Application of the Brazos River Authority for Approval  
11               of Rates;
- 12          5.    Texas Docket No. 10881 – Application of the New Era Electric Cooperative, Inc.  
13               for Authority to Change Rates;
- 14          6.    Texas Docket No. 11244 – Petition of the Medina Electric Cooperative, Inc. to  
15               Reduce its Fixed Fuel Factor and the Application of the South Texas Electric  
16               Cooperative, Inc. for Authority to Refund an Over-Recovery of Fuel Cost  
17               Revenues and to Reduce its Fixed Fuel Factor;
- 18          7.    Texas Docket No. 11271 – Application of Bowie-Cass Electric Cooperative, Inc.  
19               for Authority to Change Rates;
- 20          8.    Texas Docket No. 11567 – Application of Kaufman County Electric Cooperative,  
21               Inc. for Authority to Change Rates;
- 22          9.    Texas Docket No. 18607 – Application of West Texas Utilities Company for  
23               Authority to Reconcile Fuel Costs;
- 24          10.   Texas Docket No. 20290 – Application of Central Power & Light Company for  
25               Authority to Reconcile Fuel Costs;
- 26          11.   Virginia Case No. PUE980814 – In the matter of considering an electricity retail  
27               access pilot program: American Electric Power – Virginia;
- 28          12.   Texas Docket No. 21111 – Application of Entergy Gulf States Inc. for Authority to  
29               Reconcile Fuel Costs and to Recover a Surcharge for Under-Recovered Fuel  
30               Costs;
- 31          13.   Virginia Case No. PUE990717 – Application of Virginia Electric and Power  
32               Company to Revise Its Fuel Factor Pursuant to Virginia Code Section 56-249.6;

- 1 14. Texas Docket No. 22344 – Generic Issues Associated with Applications for  
2 Approval of Unbundled Cost of Service Rates Pursuant to PURA Section 39.201  
3 and Public Utility Commission Substantive Rule § 25.344;
- 4 15. Texas Docket No. 22350 – Application of TXU Electric Company for Approval of  
5 Unbundled Cost of Service Rates Pursuant to PURA Section 39.201 and Public  
6 Utility Commission Substantive Rule 25.344 (Phase III);
- 7 16. Texas Docket No. 22352 – Application of Central Power and Light Company for  
8 Approval of Unbundled Cost of Service Rates Pursuant to PURA Section 39.201  
9 and Public Utility Commission Substantive Rule 25.344 (Final Phase);
- 10 17. Texas Docket No. 22353 – Application of Southwestern Electric Power Company  
11 for Approval of Unbundled Cost of Service Rates Pursuant to PURA  
12 Section 39.201 and Public Utility Commission Substantive Rule 25.344 (Final  
13 Phase);
- 14 18. Texas Docket No. 22354 – Application of West Texas Utilities Company for  
15 Approval of Unbundled Cost of Service Rates Pursuant to PURA Section 39.201  
16 and Public Utility Commission Substantive Rule 25.344 (Final Phase);
- 17 19. Texas Docket No. 22356 – Application of Entergy Gulf States, Inc. for Approval  
18 of Unbundled Cost of Service Rates Pursuant to PURA Section 39.201 and Public  
19 Utility Commission Substantive Rule 25.344;
- 20 20. Texas Docket No. 22349 – Application of Texas-New Mexico Power Company for  
21 Approval of Unbundled Cost of Service Rates Pursuant to PURA Section 39.201  
22 and Public Utility Commission Substantive Rule 25.344 (Final Phase);
- 23 21. Virginia Case No. PUE000584 – Application of Virginia Electric and Power  
24 Company for Approval of a Functional Separation Plan under the Virginia Electric  
25 Utility Restructuring Act;
- 26 22. Texas Docket No. 24468 – Staff’s Petition to Determine Readiness for Retail  
27 Competition in the Portions of Texas Within the Southwest Power Pool;
- 28 23. Texas Docket No. 24469 – Staff’s Petition to Determine Readiness for Retail  
29 Competition in the Portions of Texas Within the Southeastern Electric Reliability  
30 Council;
- 31 24. Virginia Case No. PUE-2002-00377 – Application of Virginia Electric and Power  
32 Company to Revise Its Fuel Factor Pursuant to Section 56-249.6 of the Code of  
33 Virginia;
- 34 25. Texas Docket No. 27035 – Application of Central Power and Light Company for  
35 Authority to Reconcile Fuel Costs;
- 36 26. Texas Docket No. 28818 – Application of Entergy Gulf States, Inc. for Certification  
37 of an Independent Organization for the Entergy Settlement Area in Texas;

- 1 27. Virginia Case No. PUE-2000-00550 -- Appalachian Power Company d/b/a  
2 American Electric Power: Regional Transmission Entities;
- 3 28. Texas Docket No. 29408 – Application of Entergy Gulf States, Inc. for the  
4 Authority to Reconcile Fuel Costs;
- 5 29. Texas Docket No. 29801 – Application of Southwestern Public Service Company  
6 for: (1) Reconciliation of its Fuel Costs for 2002 and 2003; (2) A Finding of Special  
7 Circumstances; and (3) Related Relief;
- 8 30. Texas Docket No. 30143 -- Petition of El Paso Electric Company to Reconcile  
9 Fuel Costs;
- 10 31. Texas Docket No. 31540 – Proceeding to Consider Protocols to Implement a  
11 Nodal Market in the Electric Reliability Council of Texas Pursuant to PUC  
12 Substantive Rule 25.501;
- 13 32. Texas Docket No. 32795 – Staff’s Petition to Initiate a Generic Proceeding to Re-  
14 Allocate Stranded Costs Pursuant to PURA Section 39.253(f);
- 15 33. Texas Docket No. 33309 – Application of AEP Texas Central Company for  
16 Authority to Change Rates;
- 17 34. Texas Docket No. 33310 – Application of AEP Texas North Company for  
18 Authority to Change Rates;
- 19 35. Michigan Case No. U-15245 – In the Matter of the Application of Consumers  
20 Energy Company for Authority to Increase its Rates for the Generation and  
21 Distribution of Electricity and for Other Rate Relief;
- 22 36. Texas Docket No. 34800 – Application of Entergy Gulf States, Inc. for Authority  
23 to Change Rates and to Reconcile Fuel Costs;
- 24 37. Texas Docket No. 35717 – Application of Oncor Electric Delivery Company LLC  
25 for Authority to Change Rates.
- 26 38. RIPUC Docket No. 4065 – Application of the Narragansett Electric Company  
27 d/b/a National Grid for Approval of a Change in Electric Base Distribution Rates  
28 Pursuant to R.I.G.L. Sections 39-3-10 and 39-3-11;
- 29 39. RIPUC Docket No. 4323 – Application of the Narragansett Electric Company  
30 d/b/a National Grid for Approval of a Change in Electric and Gas Base Distribution  
31 Rates Pursuant to R.I.G.L. Sections 39-3-10 and 39-1-3-11;
- 32 40. Oregon Docket No. UE 283 -- In the Matter of Portland General Electric  
33 Company’s Request for a General Rate Revision;
- 34 41. Washington Docket No. UE-141368 – In the Matter of the Petition of Puget Sound  
35 Energy to Update Methodologies Used to Allocate Electric Cost of Service and  
36 for Electric Rate Design Purposes;

- 1           42. Federal Energy Regulatory Commission Docket No. EL15-82-000 -- Illinois  
2           Industrial Energy Consumers, Complainant, v. Midcontinent Independent System  
3           Operator, Inc., Respondent;
- 4           43. RIPUC Docket No. 4568 – In Re: Review of the Narragansett Electric Company  
5           d/b/a National Grid's Rate Design Pursuant to R.I. General Laws Section 39-26.6-  
6           24;
- 7           44. Washington Docket Nos. UE-170033 and UG-170034 – Washington Utilities and  
8           Transportation Commission, Complainant, v. Puget Sound Energy, Respondent;  
9           and
- 10          45. RIPUC Docket No. 4770 – The Narragansett Electric Company d/b/a National  
11          Grid – Application for Approval of a Change in Electric and Gas Base Distribution  
12          Rates.

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