

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

IN THE MATTER OF THE APPLICATION OF)
OKLAHOMA GAS AND ELECTRIC COMPANY)
FOR AN ORDER OF THE COMMISSION)
AUTHORIZING APPLICANT TO MODIFY ITS) CASE NO. PUD 2023-000087
RATES, CHARGES, AND TARIFFS FOR RETAIL)
ELECTRIC SERVICE IN OKLAHOMA)

Direct Testimony

of

James Alexander

on behalf of

Oklahoma Gas and Electric Company

December 29, 2023

James Alexander
Direct Testimony

QUALIFICATIONS, EXPERIENCE AND PURPOSE

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Q. Please state your name and business address.

A. My name is James Alexander. My business address is 321 N. Harvey Ave., Oklahoma City, Oklahoma 73102.

Q. By whom are you employed and in what capacity?

A. I am employed by Oklahoma Gas and Electric Company (“OG&E” or “Company”) as a Senior Pricing Analyst. My business address is 321 N. Harvey, Oklahoma City, Oklahoma, 73102. As a pricing analyst I am a part of the team that develops and supports pricing structures, charges and service provisions of tariffs, product platforms, pilot programs and other retail electricity pricing initiatives. The pricing department collects customer usage and revenue data, analyzes various cost information, research different regulated retail electricity pricing practices, and studies the impacts of OG&E’s pricing practices on customers.

Q. Please summarize your educational qualifications and professional experience.

A. I am a graduate of the University of Oklahoma, Price College of Business. I graduated in 2013 with a Bachelor of Business Administration, majoring in Energy Management. I am also pursuing a dual program Master of Business Administration and Master of Finance at the University of Oklahoma. I began my career at Invenergy, LLC as a Power Scheduler in the Operations Department. Following Invenergy, I took a position as a Power Trader and Operations Analyst at the Oklahoma Municipal Power Authority. In 2017, I began working for the Oklahoma Attorney General as a Regulatory Analyst in the Utility Regulation Unit. There, I testified on a wide variety of topics concerning Oklahoma regulated utilities. In 2021, I left the energy industry and began a career in banking where I worked as a Credit Analyst at Simmons Bank and Credit Specialist at Bank of Oklahoma. In October 2023, I began working for OG&E’s regulatory department.

1 Q. **Have you previously filed testimony before the Oklahoma Corporation Commission**
2 **(the “Commission”)?**

3 A. Yes, I have. My credentials have previously been accepted by the Commission.
4

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

6 A. The purpose of my testimony is to detail and support the changes that were made to
7 OG&E’s tariffs. These changes are set forth in the Company’s Minimum Filing
8 Requirements package at Schedule N.
9

10 Q. **Has OG&E updated the revenue and kWh allocators in the tariffs provided in**
11 **Schedule N?**

12 A. No. All allocators in OG&E’s tariffs and riders will be updated as part of the compliance
13 filing in this cause.
14

15 Q. **Do any of the changes that you will be discussing result in a substantial update or**
16 **change to these tariffs?**

17 A. No, they do not. These changes are to provide consistency between OG&E’s tariffs
18 currently on file and to clarify existing Company policies.
19

20 **RESIDENTIAL TARIFF UPDATES**

21 Q. **What changes were made to Residential tariffs?**

22 A. The Company made changes to each of the Time of Use (“TOU”) tariffs, expanding the
23 benefit months of the senior citizen discount and increasing the amount of benefit during
24 summer months. Further, the Company is proposing a change to each of the TOU- based
25 tariffs’ program titles.
26

27 Q. **What changes were made to the Senior Citizens TOU (Silver Energy) Discount?**

28 A. The Company is seeking approval to expand the \$5.00 monthly Senior Citizen discount to
29 all twelve billing periods; an expansion from the five summer months currently allowed
30 under the tariff. Further, the Company would like to increase the discount during the
31 summer period from \$5 to \$10. By doing so, the benefit for eligible customers is increased

1 from \$25 to \$85 per year. This is applicable to the Residential Time-of -Use, Residential
2 Variable Peak Pricing, and Residential Electric Vehicle Time-of-Use tariffs. Please refer
3 to the testimony of OG&E witness Gwin Cash for further information regarding Silver
4 Energy.

5
6 **Q. What are the new titles of the programs OG&E is making, and why are these changes
7 being proposed in this cause?**

8 A. The Company is updating the names of certain programs to provide more consistent
9 language across the programs for Residential and General Service customers. If approved,
10 the programs would be renamed as such:

- 11 • Variable Peak Pricing will become “SmartHours Daily”
- 12 • Time-of-Use will become “SmartHours Fixed”
- 13 • Electric Vehicle Time-of-Use will become “SmartHours Overnight”

14
15 **GENERAL SERVICE TARIFF UPDATES**

16 **Q. What changes were made to the General Service (“GS”) tariffs?**

17 A. The Company made specific edits to the GS Guaranteed Flat Billing (“GS-GFB”) tariff.
18 The Company is also proposing a change to the TOU based tariffs’ program titles to be
19 consistent with the titles proposed in the Residential program titles listed above.

20
21 **Q. What changes did OG&E make to the GS-GFB tariff?**

22 A. The Company has updated the language in the GS-GFB tariff to clarify that subscribers to
23 General Service – Electric Vehicle Time-of-Use rates are not eligible to enroll in the GFB
24 tariff.

25
26 **Q. Will the new titles for General Service TOU based tariffs be consistent with the
27 Residential class?**

28 A. Yes. The new program titles were updated to remain consistent between the Residential
29 and General Service classes.

**DAY AHEAD PRICING (“DAP”) FLEX PRICE (“FP”)
AND LOAD REDUCTION RIDER (“LR”) TARIFF UPDATES**

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2
3 Q. **What changes have been made to the DAP, FP, and LR tariffs?**

4 A. Changes have been made to the availability section, and the remainder of the language in
5 the tariffs have been updated to remain consistent with those changes. In the LR tariff,
6 there is also a change to the pricing updates.
7

8 Q. **What changes have been to the availability section of these tariffs?**

9 A. The availability sections of the tariffs have been updated to remove the option for
10 subscribers of the DAP or FP tariffs to co-subscribe to the LR tariff. Any language
11 throughout each respective tariff has been conformed to reflect this change regarding the
12 removal of co-subscribing.
13

14 Q. **What is the change to the LR pricing updates?**

15 A. The Company is proposing a change to the frequency of updates to the LR tariff pricing.
16 Currently the Company is required to update the pricing for this tariff annually. The
17 Company has altered the language in the tariff to be updated “as needed.”
18

19 **MUNICIPAL PUMPING TARIFF UPDATES**

20 Q. **What is the change to the Municipal Pumping (PM-1) tariff?**

21 A. The Company has removed language in the PM-1 tariff that describes peak and off-peak
22 seasons. This tariff is not a Time of Use tariff and therefore the language is not applicable.
23

24 **GREEN POWER WIND RIDER (“GPWR”), RENEWABLE ENERGY
25 PROGRAM (“REP”), AND UTILITY SOLAR PROGRAM (“USP”) TARIFF
26 UPDATES**

27 Q. **What changes have been made to GPWR, REP, and USP tariffs?**

28 A. These tariffs have had specific language added to each program clarifying marketing and
29 education budget. In addition to these shared changes, the REP tariff has also been altered
30 to reflect a change in the frequency of pricing updates.

1 Q. **What are the updates to the marketing and education budgets?**

2 A. The language added to these tariffs allows for shared marketing and education budgets
3 between OG&E's family of "Green Energy Programs," (GPWR, REP, and USP). This
4 change will allow the Company to adequately market and educate this collection of
5 programs and any additional programs as they are made available.

6

7 Q. **What is the change to the REP tariff's frequency of pricing updates?**

8 A. The Company is proposing a change to the frequency of updates to the REP tariff pricing.
9 Currently the Company is required to update the pricing for this tariff annually. The
10 Company has altered the language in the tariff to be updated "as needed."

11

12 **TERMS AND CONDITIONS UPDATES**

13 Q. **What changes are OG&E proposing to the Terms & Conditions?**

14 A. OG&E is updating sections 208, 213, 214, and 220. The Company is also proposing the
15 addition of language regarding access to customer's property and the launch of a pilot
16 program for large industrial customers titled "myOGEpay C&I."

17

18 Q. **What are the changes to section 208?**

19 A. There is one addition in section 208 under Inadequate deposits. The Company has included
20 language that allows the Company to increase the required deposit. The event is triggered
21 when the Company finds an increased load on the account and that account is not eligible
22 for a deposit return. This section is not applicable to residential customers.

23

24 Q. **What are the changes to section 213?**

25 A. The Company has shortened the title of the section from "Consumer's Responsibility For
26 Company Property," to "Responsibility For Company Property." In addition to this
27 change, the Company has expanded the language in the section for increased clarity.

28

29 Q. **What are the changes to section 214?**

30 A. The Company has updated the title of this section from "Fraudulent Use of Electricity" to
31 "Fraudulent or Unauthorized Use of Electricity." The Company has also added language

1 to this section to better define “fraudulent use of electricity.” Lastly, the Company has
2 added the option to charge a tampering fine when there is evidence of tampering with
3 Company property.
4

5 **Q. What are the changes to section 220?**

6 A. This section includes multiple revisions including an alteration of the program name from
7 “PayGo” to “myOGEpay” for Residential customers. The language in the Residential
8 customer portion has also been updated to provide additional specifics for customer
9 notifications and billing exclusions. Further, the initial account balance has been increased
10 from \$25 to \$40. In addition to the changes made to Residential Customers, the Company
11 is expanding this program to Non-Residential customers and language has been added to
12 provide eligibility and user responsibility details for this offering.
13

14 **Q. What addition to the Terms and Conditions has been made to allow for the proposed
15 optional “myOGEpay C&I” pilot program?**

16 A. Section 220 of the Terms and Conditions has been expanded to introduce the new
17 “myOGEpay C&I” pilot program. The pilot program is designed for very large C&I
18 customers (loads >20,000 kW), which would normally require a large deposit posted to the
19 Company. This program utilizes a pre-pay bill estimation process and true up method to
20 allow for the release of deposits back to customers while preventing unrecovered large
21 customer balances. Because of the uncertainty associated with not requiring a deposit,
22 subscription to the pilot program is at OG&E’s sole discretion.
23

24 **Q. What addition has been made regarding access to customer property?**

25 A. The Company has added language to the Terms and Conditions to allow OG&E access to
26 a customer’s premises for routine procedures and emergency repairs to Company property
27 necessary to provide electric service. Further, the addition also includes a notation that
28 OG&E employees and representatives are issued Company identification cards which
29 should be presented to the customer and forbids any employee from charging any customer
30 without an OG&E printed receipt being given in return.

1 Q. **What addition has been made to the line extension policy?**

2 A. The Company has added language regarding estimates of line extension. This change
3 would ensure prospective customers will now be required to pay for any costs incurred by
4 the Company when providing an estimate. Should the prospective customer move forward
5 with the Company, the payment would be applied as a contribution to the construction
6 costs.

7

8

RECOMMENDATIONS

9 Q. **What is your recommendation to the Commission?**

10 A. I recommend the Commission approve all changes to the tariffs as proposed in my
11 testimony and as reflected in Schedule N of the Minimum Filing Requirements package.

12

13 Q. **Does this conclude your direct testimony?**

14 A. Yes.

