

**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 )  
RATES, CHARGES, AND TARIFFS FOR RETAIL )  
ELECTRIC SERVICE IN OKLAHOMA )**

**CAUSE NO. PUD 201700496**

**FILED**  
MAY 02 2018

**COURT CLERK'S OFFICE - OKC  
CORPORATION COMMISSION  
OF OKLAHOMA**



**RESPONSIVE TESTIMONY**

**OF**

**KATHY CHAMPION**

**MAY 2, 2018**

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**TABLE OF CONTENTS**

<b>INTRODUCTION.....</b>	<b>3</b>
<b>PURPOSE.....</b>	<b>4</b>
<b>EXECUTIVE SUMMARY .....</b>	<b>4</b>
<b>PUD’S REVIEW PROCESS.....</b>	<b>5</b>
<b>MANUAL POSTING ADJUSTMENT .....</b>	<b>6</b>
<b>RIDER REVENUES.....</b>	<b>6</b>
<b>BEST BILL.....</b>	<b>8</b>
<b>FREE SERVICE, LOW INCOME ASSISTANCE PLAN, AND.....</b>	<b>8</b>
<b>SENIOR CITIZEN DISCOUNT .....</b>	<b>8</b>
<b>RATE RECALCULATION.....</b>	<b>10</b>
<b>CUSTOMER GROWTH, ANNUALIZATION, AND ADDITIONS ADJUSTMENT .....</b>	<b>11</b>
<b>DEMAND PROGRAM EXPENSE REMOVAL ADJUSTMENT .....</b>	<b>14</b>
<b>DEMAND PROGRAM SAVINGS REVENUE ADJUSTMENT .....</b>	<b>15</b>
<b>RECOMMENDATION.....</b>	<b>16</b>
<b>LIST OF EXHIBITS.....</b>	<b>18</b>

**INTRODUCTION**

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

A: My name is Kathy Champion. My business address is Oklahoma Corporation Commission, Public Utility Division, Jim Thorpe Office Building, Room 580, 2101 North Lincoln Boulevard, Oklahoma City, Oklahoma 73105.

**Q: Have you previously testified before the Oklahoma Corporation Commission (“OCC” or “Commission”) and were your qualifications accepted?**

A: Yes. I have previously testified before the Commission and my qualifications were accepted at that time.

**Q: Who employs you and what is your position?**

A: I am employed by the Public Utility Division (“PUD”) of the Commission as a Public Utility Regulatory Analyst.

**Q: How long have you been so employed?**

A: I have been employed by the Commission since July 2013.

**Q: What are your duties and responsibilities with PUD?**

A: My principal responsibility is to audit and analyze utility applications, reports, financial records, and all workpapers to assist PUD in making an accurate recommendation to the Commission. My primary responsibilities are related to energy efficiency programs and policies, Cost of Service (“COS”), and Rate Design reviews for both electric and gas

1 utilities. For a complete list of my work history and educational background, please  
2 review the attached curriculum vitae.<sup>1</sup>

3 **PURPOSE**

4 **Q: What is the purpose of your Testimony regarding the Application filed by Oklahoma**  
5 **Gas and Electric Company (“OG&E” or “Company”) for an Order of the**  
6 **Commission authorizing Applicant to modify its rates, charges, and tariffs for retail**  
7 **electric service in Oklahoma as filed in Cause No. PUD 201700496?**

8 **A: The purpose of this Responsive Testimony is to present PUD’s recommendations regarding**  
9 **Cause No. PUD 201700496 for the following areas:**

- Manual Posting Adjustment
- Rider Revenues
- Best Bill
- Customer Growth and Annualization
- Demand Program Savings
- Free Service, Low Income Assistance Plan, and Senior Citizen Discount
- Rate Recalculation
- Demand Side Management Expense Removal

10 **EXECUTIVE SUMMARY**

11 On January 16, 2018, Oklahoma Gas and Electric Company (“OG&E” or “Company”)  
12 filed its Application for an adjustment in its rates, charges, and tariffs for retail electric  
13 service in Oklahoma. The Public Utility Division (“PUD”) reviewed the Application,  
14 Testimony of Company witnesses, and Company workpapers. PUD also issued data  
15 requests and reviewed associated responses. PUD also reviewed the data requests issued  
16 by intervenors, including the Attorney General, Oklahoma Cogeneration, LLC, and

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<sup>1</sup> Exhibit KJC-1.

1 Oklahoma Industrial Energy Consumers, and the associated responses. PUD also held  
2 discussions with Company personnel at the Company's corporate office in Oklahoma  
3 City, Oklahoma.

4 PUD agrees that the methodology used by OG&E for the reviewed areas was applied  
5 correctly, follows past practices, and was arithmetically accurate. PUD recommends the  
6 Commission accept the Company's proposed adjustments for the following areas:

Manual Posting Adjustment	(\$853,441)
Rider Revenues	(\$102,881,508)
Best Bill	\$36,389
Demand Program Savings	(\$4,011,521)
Free Service, Low Income Assistance Plan, and Senior Citizen Discount	(\$5,315,176)
Rate Recalculation	\$57,612,870
Demand Side Management Expense Removal	\$36,745,348

7 PUD further recommends an adjustment of \$6,729,430 to decrease the Customer Growth  
8 and Annualization and Weatherization Revenue adjustments proposed by OG&E in the  
9 Application. The purpose of this adjustment is to update to the six-month post test year  
10 data.

### 11 PUD'S REVIEW PROCESS

12 **Q: Please explain PUD's review process in this Cause.**

13 A: PUD reviewed the Application, Direct Testimony of Company witnesses, schedules,  
14 workpapers, and sponsored exhibits filed by the Company. In addition, PUD reviewed  
15 OG&E's prior workpapers, testimony, and sponsored exhibits, along with Final Order  
16 No. 662059 in Cause No. PUD 201500273. PUD issued data requests and reviewed all

1 responses provided by OG&E. PUD also reviewed the data requests issued by  
2 intervenors, including the Attorney General, Oklahoma Cogeneration, LLC, and  
3 Oklahoma Industrial Energy Consumers, and the associated responses. PUD also held  
4 discussions with Company personnel at the Company's corporate office in Oklahoma  
5 City, Oklahoma.

### 6 MANUAL POSTING ADJUSTMENT

7 **Q: What are Manual Posting adjustments and has OG&E proposed such an**  
8 **adjustment?**

9 A: Manual postings are manual revenue entries that do not correspond to billing determinant  
10 adjustments. These are revenue credits for non-typical customer specific issues such as  
11 metering issues or lights burned out and not reported. Since these revenues are not  
12 considered an ongoing occurrence, and not tied to base rate revenue, this adjustment is  
13 necessary to reflect normal revenue levels. For the test year, OG&E proposed an  
14 \$853,441 reduction to revenues for the Oklahoma jurisdiction.

15 **Q: Does PUD agree with OG&E's proposed adjustment to Manual Postings?**

16 A: Yes. PUD reviewed supporting documentation for the test year, as well as supporting  
17 documentation provided for the previous rate case. PUD recommends that the Commission  
18 accept OG&E's proposed \$853,441 adjustment to decrease revenues.

### 19 RIDER REVENUES

20 **Q: What are Rider revenue adjustments and has OG&E proposed such an adjustment?**

1 A: This test year adjustment removes all rider revenue, except the fuel adjustment clause  
 2 revenues, from the Cost of Service Study (“COSS”), reducing test year revenues by  
 3 \$102,881,508.

Rider	Amount
Annual Public Utility Assessment Fee (APUAF)	\$ (2,316,326)
Cogen Credit Rider (CCR)	\$ 11,059,181
Crossroads Rider (CR)	\$ (12,383,343)
Demand Program Rider (DPR)	\$ (67,536,909)
Green Power Wind Rider (GPWR)	\$ (2,183,317)
Interim Rates PUD 201500273 Rider (IR273)	\$ 13,370,793
Military Base Tariff Credit Rider (MBTC)	\$ (100,766)
Renewable Energy Program (REP)	\$ (408,523)
Renewable Transmission Systems Additions Rider (RTSA)	\$ 34,129,230
Storm Cost Recovery Rider (SCRR)	\$ (11,999,222)
Smart Grid Rider (SGR)	\$ (8,175,003)
System Hardening Program Rider (SHPR)	\$ (2,843,511)
Southwest Power Pool Cost Tracker Rider (SPPCT)	\$ (50,743,924)
Southwest Power Pool Transmissions System Additions Rider (STSA)	\$ (2,299,879)
Utility Solar Pilot Program (USP)	\$ (449,987)
Total	\$(102,881,508)

4 Rider revenues and associated expenses are removed to maintain consistency with the  
 5 matching principle. Likewise, a rider revenue addition of \$4,290,832 was proposed by  
 6 OG&E to reflect the riders that will have expenses or plant rolled into base rates in this  
 7 filing. The Demand Program Rider is moving the Integrated Volt-Var Control System  
 8 into base rates and there is also a credit associated with the Cogen Credit Rider.

9 **Q: Does PUD agree with OG&E’s proposed adjustment?**

10 A: Yes. PUD reviewed supporting documentation for the test year, the Order from the  
 11 previous cause,<sup>2</sup> and data requests from other parties. The Rider revenues represent  
 12 revenues that will be recovered outside of base rates, and PUD recommends that the

<sup>2</sup> Cause No. PUD 201700273, Order No. 662059.

1 Commission accept OG&E's proposed \$102,881,508 adjustment to reduce test year  
2 revenues.

3 **BEST BILL**

4 **Q: What is the purpose of the adjustment for the Best Bill Provision?**

5 A: The Best Bill adjustment removes booked credits from billed revenue associated with the  
6 Time of Use ("TOU"), Variable Peak Pricing ("VPP"), and Critical Peak Pricing ("CPP")  
7 tariffs which all have a one-year Best Bill provision. The Best Bill provision guarantees  
8 participating customers will be billed at the better of the time-differentiated rates or their  
9 previous tariff. This adjustment increases the test year revenues by \$36,389.

10 **Q: Does PUD agree with OG&E's proposed adjustment?**

11 A: Yes. The Best Bill credits do not tie to specific billing unit adjustments, nor do they  
12 specifically indicate a rate change during the test year. PUD recommends removing these  
13 credits as they do not represent an on-going level of revenues. PUD reviewed the  
14 supporting documentation for this adjustment and believes it is accurate and consistent with  
15 past treatment and recommends that the Commission accept OG&E's proposed Best Bill  
16 adjustment.

17 **FREE SERVICE, LOW INCOME ASSISTANCE PLAN, AND**

18 **SENIOR CITIZEN DISCOUNT**

19 **Q: Please describe the Free Service, Low Income Assistance Plan ("LIAP"), and Senior**  
20 **Citizen Discount adjustments proposed by OG&E.**



1 A: The free municipal lighting service for franchised municipalities, the LIAP, and the  
2 Senior Citizen Discount are programs that provide service to customers for free or at a  
3 discounted rate. The discounts for these programs create a revenue shortfall that is  
4 collected from other customers. This adjustment removes the additional revenue from  
5 the test year and results in a decrease to revenues of \$5,315,176.

6 **Q: Why is the Municipal Lighting portion of this adjustment proper?**

7 A: Due to franchise agreements granting free service to certain municipalities, the booked  
8 revenues and billing units in the Municipal Lighting class do not reflect recovery of all  
9 revenues for that class. This adjustment adds the free fixtures and associated kWh and  
10 revenues into the lighting class to ensure proper Rate Design and COSS assignment.  
11 Making this kWh and revenue adjustment prevents the Municipal Lighting Class from  
12 showing a deficiency that other Municipal Lighting customers would be solely  
13 responsible to pay for.

14 **Q: Why are the LIAP and Senior Citizen Discount portions of this adjustment proper?**

15 A: This discount for eligible low-income customers is a \$10 credit each month and the  
16 discount for eligible senior citizen customers is a \$5 credit during the five months of June  
17 through October. As with the Free Lighting Service, these credits decrease book  
18 revenues for the classes that include these customers. To prevent the exclusive recovery  
19 of these credits from the Residential class, the recovery of the credits is distributed  
20 among all retail customer classes.

1 **Q: Does PUD agree with OG&E's proposed Free Service, LIAP, and Senior Citizen**  
2 **Discount adjustments?**

3 A: Yes. PUD reviewed the supporting documents and treatment in previous causes and  
4 believes this adjustment accurately removes the additional revenue from the test year.  
5 PUD recommends approval of the proposed decrease to revenues of \$5,315,176.

6 **RATE RECALCULATION**

7 **Q: Please describe the Rate Recalculation adjustment proposed by OG&E.**

8 A: Final Order No. 662059 in Cause No. PUD 201500273 resulted in new rates being  
9 implemented by OG&E on May 1, 2017. In order to reflect revenues consistent with that  
10 Final Order, it was necessary to adjust the period October 1, 2016, through April 30,  
11 2017. In addition to adjusting prices, adjustments were also made to reflect riders rolled  
12 into base rates and production tax credits which expired in early 2017, which were also  
13 approved as a result of Cause No. PUD 201500273. The resulting Rate Recalculation  
14 adjustment increased revenues by \$57,612,870.

15 **Q: Does PUD agree with OG&E's proposed adjustment?**

16 A: Yes. PUD reviewed supporting documentation for the test year and discussed with  
17 Company personnel the process used to develop calculations provided by the Company to  
18 gross up the sales to reflect those approved in Final Order No. 662059. PUD believes the  
19 Rate Recalculation was accurate and recommends that the Commission accept OG&E's  
20 proposed \$57,612,870 increase to base revenues.

1           **CUSTOMER GROWTH, ANNUALIZATION, AND ADDITIONS ADJUSTMENT**

2   **Q:   Please describe the Customer Growth and Annualization adjustment.**

3   A:   This adjustment is made to reflect customer counts and consumption volumes in place at  
4       the end of the test year period in order to capture the growth or decline in customer  
5       counts and consumption volumes for each rate class. The test year end adjustment  
6       proposed by the Company resulted in a net revenue increase of \$27,066,698 and a net  
7       sales increase of 642,373,670 kWhs.

8   **Q:   Please explain the method used for calculating the Customer Growth adjustment.**

9   A:   For classes that include Service Levels 1 through 4 and for the Large Power and Light  
10       customer class at Service Level 5 ("SL5"), the Company's adjustments were made on a  
11       customer by customer basis based on knowledge obtained from existing and new  
12       customers. Because of the large number of customers taking SL5 service, OG&E used a  
13       linear trend to establish the average customer adjustment for the SL5 customers in those  
14       classes.

15   **Q:   Please describe the linear trend method used by the Company to adjust the SL5**  
16       **customer classes for growth.**

17   A:   OG&E used 60 months of customer data and applied a linear trend for each of the SL5  
18       classes to project the customer count to the end of the post test year period. The  
19       Company takes this growth and applies an average kWh per customer in order to  
20       annualize test year revenues and billing units to establish minimum levels of customer  
21       usage on a prospective basis. This method captures customer growth through the end of

1 the post test year period using a known and measurable growth rate for each customer  
2 class that was projected. This adjustment resulted in a net revenue increase of  
3 \$13,834,613 and a sales increase of 258,645,594 kWh.

4 **Q: Please describe in further detail the customer annualization adjustments applied on**  
5 **a customer by customer basis.**

6 A: This adjustment was made for those customers who switched rates or were new to the  
7 system during the year. Because those customers did not have a full year of service, sales  
8 are added to the months in the test year. The annualized sales adjustments were based on  
9 average customer sales similar in size. This adjustment resulted in a net revenue increase  
10 of \$9,310,777 and a sales increase of 210,127,330 kWh.

11 **Q: Please describe the large customer additions adjustment.**

12 A: For large customers, OG&E identified eight customers expected to join the system.  
13 OG&E estimated the kWh, kW, and On/Off Peak Data, and that data was added into the  
14 test year to account for these expected new customers. This adjustment resulted in a net  
15 revenue increase of \$3,502,549 and a sales increase of 165,740,952 kWh.

16 **Q: Did OG&E also provide a post test year update for the Customer/Weatherization**  
17 **adjustment?**

18 A: Yes. As shown below, the Company's post test year projection for growth for most of  
19 the SL5 classes was fairly accurate; however, the results for the Power and Light class  
20 were not. In discussion with the Company, the primary reason identified for the

1 difference was an error in projecting the customer migration between the General Service  
 2 and Power and Light customer classes. The Company will be updating its linear  
 3 progression method to more accurately reflect the customer growth by beginning the  
 4 trend after the last migration for future proceedings.

RATE	FINAL ADJUSTED REVENUE - FILED	FINAL ADJUSTED REVENUE - 6 Month Update	Difference	% Change	CUST COUNT - FILED	CUST COUNT - 6 Month Update	Difference	% Change
Residential	\$ 580,220,547	\$ 582,816,861	\$ 2,596,314	0.45%	665,498	663,542	(1,956)	-0.29%
General Service	\$ 122,615,438	\$ 125,272,061	\$ 2,656,623	2.17%	83,434	84,574	1,140	1.37%
Oil Gas Producer	\$ 10,441,350	\$ 10,551,200	\$ 109,850	1.05%	4,867	4,866	(1)	-0.01%
PSchools Sm	\$ 11,377,752	\$ 11,417,064	\$ 39,312	0.35%	\$ 2,534	\$ 2,476	\$ (58)	-2.28%
PSchools Large	\$ 7,289,758	\$ 7,516,086	\$ 226,328	3.10%	\$ 291	\$ 300	\$ 9	3.25%
Power Light	\$ 279,192,046	\$ 267,620,130	\$ (11,571,916)	-4.14%	\$ 16,734	\$ 15,866	\$ (868)	-5.19%
Large PL	\$ 128,985,687	\$ 128,174,973	\$ (810,714)	-0.63%	\$ 121	\$ 120	\$ (1)	-0.83%
Pump Muni	\$ 4,114,373	\$ 4,139,742	\$ 25,368	0.62%	\$ 1,368	\$ 1,365	\$ (3)	-0.23%
Light Muni	\$ 13,654,311	\$ 13,654,311	\$ -	0.00%	\$ 238	\$ 239	\$ 1	0.42%
Outdoor Ssec Light	\$ 16,370,215	\$ 16,369,618	\$ (597)	0.00%	\$ 68,779	\$ 68,561	\$ (218)	-0.32%
Total	\$ 1,174,261,476	\$ 1,167,532,046	\$ (6,729,430)	-0.57%	\$ 843,863	\$ 841,909	\$ (1,954)	-0.23%

5 For this Cause, PUD agrees it is more accurate to use the updated post test year numbers  
 6 to develop the customer growth adjustment. The chart on the next page was summarized  
 7 from the H-2 schedules to show the difference between the test year and post test year  
 8 adjustments. This update to the Customer growth, annualization, and additions, as well  
 9 as an update to the weatherization for the SL5 classes, results in a revenue decrease of  
 10 \$6.7 million.

	As filed	Post test year (AG 12-3)	Adjustment
Growth	\$ 13,834,613	\$ 4,408,085	\$ 9,426,528
Annualization	\$ 9,310,777	\$ 9,893,410	\$ (582,634)
Large Additions	\$ 3,502,549	\$ 1,219,188	\$ 2,283,361
Migration	\$ 418,759	\$ 418,759	\$ -
	\$ 27,066,698	\$ 15,939,442	\$ 11,127,256
Weatherization	\$ 30,253,485	\$ 34,648,751	\$ (4,395,266)
Total Post test adjustment			\$ 6,731,990

1 **Q: Does PUD have any additional concerns with the post test year revenue**  
2 **adjustments?**

3 A: Yes. The Company not only projected the revenues but also used the underlying  
4 kWh/kW to project the customer billing determinants and load data. Those values are  
5 used in developing the Allocation factors used in COS. Because OG&E updated those  
6 values to develop new revenues, those values will likewise need to be updated so that the  
7 Allocation factors represent the post test year adjustments to revenues.

8 **DEMAND PROGRAM EXPENSE REMOVAL ADJUSTMENT**

9 **Q: Please explain the Demand Program Expense Removal adjustment related to**  
10 **demand programs and Energy Efficiency expenses for Oklahoma and Arkansas.**

11 A: This adjustment removes costs related to the Oklahoma Demand Program Rider (“DPR”)  
12 and the Arkansas Energy Efficiency Cost Recovery (“EECR”) Rider. These costs are  
13 recovered through ongoing rider mechanisms and should therefore be removed from base  
14 rates. This adjustment decreases operations and maintenance expense by \$43,193,100.

15 **Q: Does PUD agree with OG&E’s proposed adjustment?**

16 A: Yes. PUD reviewed the supporting documents provided in this Cause, and those from the  
17 previous cause, and believes this adjustment is consistent. Removing this expense also  
18 maintains the matching principle as the rider revenues associated with these expenses are  
19 also removed.

**DEMAND PROGRAM SAVINGS REVENUE ADJUSTMENT**

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**Q: What is the adjustment related to the Demand Programs Savings? Please explain why it is necessary.**

A: The Company's Demand Program Savings adjustment was made to decrease the energy, demand, and revenues associated with the lost sales resulting from Energy Efficiency measures implemented through the Demand Programs Rider through September 2017 and projected through March 2018. This adjustment allows the Company to recover the lost sales made through the post test period directly through rates instead of forcing that recovery through the DPR rider. PUD will address this issue further in the COS/Rate Design testimony of this Cause. The Company's Demand Program savings/lost revenue adjustment results in a revenue decrease of \$4,011,521 and a decrease of 116,092,299 kWh.

**Q: Does PUD agree with OG&E's proposed adjustment?**

A: PUD agrees with the Demand Program Savings adjustment, but PUD does not agree with the Company that the Demand Program Rider should not be adjusted to reflect this movement of lost revenue recovery into base rates. Again, this issue will be discussed in detail in the COS/Rate Design phase of this Cause.

**RECOMMENDATION**

1

2 **Q: What is PUD's overall recommendation?**

3 A: PUD recommends that the Commission accept the following adjustments, as proposed by

4 OG&E:

Manual Posting Adjustment	(\$853,441)
Rider Revenues	(\$102,881,508)
Best Bill	\$36,389
Demand Program Savings	(\$4,011,521)
Free Service, LIAP, and Senior Citizen Discount	(\$5,315,176)
Rate Recalculation	\$57,612,870
Demand Side Management Expense Removal	\$36,745,348

5 PUD also recommends the Commission accept PUD's post test year adjustment as  
6 presented in this Testimony to decrease the Customer Growth and Annualization and  
7 Weatherization Revenues in the amount of \$6,731,990.

8 PUD believes that the recommendations made in this Testimony are fair, just, reasonable,  
9 and in the public interest.



I state, under penalty of perjury under the laws of Oklahoma, that the foregoing is true and correct to the best of my knowledge and belief.

[Signature]  
FENERGY CORPORATION on BEHALF OF  
(Kathy Champion) KATHY CHAMPION

State of Oklahoma  
County of Oklahoma

Subscribed and sworn to before me this 2nd day of May, 2018



(Seal, if any)

Tish R. Coats  
NOTARY PUBLIC

PUD Manager  
Title

My Commission Number: 18005781

My Commission Expires: June 13, 2020

**Oklahoma Gas and Electric Company – Cause No. PUD 201700496**

**LIST OF EXHIBITS**

KJC-1

*Curriculum Vitae*



## Kathy Champion

Exhibit KJC-1

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- Work Experience**
- ▶ **Oklahoma Corporation Commission, Public Utility Division, Oklahoma City**  
**July 2013 - present: Public Utility Regulatory Analyst, Energy Policy Group**
    - Special Focus – Oklahoma Corporation Commission Demand Programs, Energy Efficiency, Rulemakings
    - Expert Witness – recommendations and written and oral testimony
    - Analysis - Utilities service rates, terms and conditions
  
  - ▶ **Champion Energy Consulting, Tulsa**  
**January 2012 – July 2013: Owner/President**
    - Provided rate, energy efficiency, and marketing consulting services to utilities and customers.
    - Developed Energy Education offering for school children
  
  - ▶ **Public Service Company of Oklahoma, Tulsa**  
**April 2008 – November 2011: Manager Consumer Programs**
    - Managed the development and continued operation of PSO's energy efficiency and demand response programs, supervising a staff of five with budget of \$25 million
    - Budgeting, reporting
    - Issued and reviewed request-for-proposals, and contract development for third-party service providers
    - Provided Regulatory support, expert testimony and analysis for Energy Efficiency and Demand Response portfolio programs, budgets and recovery mechanisms.
  
  - ▶ **AEP Services Company, Tulsa**  
**January 2000-March 2008: Principal Regulatory Consultant**
    - Supporting all of the AEP western utilities in Oklahoma, Arkansas, Louisiana, and Texas, provided rate and regulatory expertise before the various state regulatory agencies.
    - Provided analysis and testimony for a variety of studies and programs including, class cost-of-service studies, tariffs, revenue allocation, and price/revenue recovery issues.
    - Supported standard tariff offerings, as well as specialty rates and riders, including time-of-day, load reduction or interruptible rates, Energy Efficiency and Green Power offerings.
    - Represented the Company on a variety of rulemakings and policy proceedings before the state regulatory agencies and the SPP Market Working Group

- 
- Education**
- ▶ Bachelor of Science (Business), Oklahoma Wesleyan College, Bartlesville, OK December 2000
  - ▶ Associate of Science (Computer Science), Tulsa Community College, Tulsa, OK, May 1986

- 
- Professional Training**
- ▶ Arthur Anderson Rate Case Process - 1990
  - ▶ Building Performance Institute – Building Analyst Training - 2012
  - ▶ LEED Green Associate Course - 2013
  - ▶ Principles of Evaluation, Measurement and Verification 2010

## CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on the 2<sup>nd</sup> day of May, 2018, a true and correct copy of the above and foregoing was sent **electronically**, addressed to the following:

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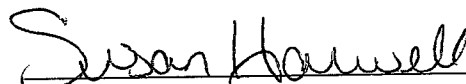
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