

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)
APPROVING A RECOVERY MECHANISM FOR)
EXPENDITURES RELATED TO THE)
OKLAHOMA GRID ENHANCEMENT PLAN)

CAUSE NO. PUD 202000021

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RESPONSIVE TESTIMONY

OF

KATHY CHAMPION

AUGUST 25, 2020

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On February 24, 2020, Oklahoma Gas and Electric Company (“OG&E”) filed its Application in this Cause requesting the Oklahoma Corporation Commission (“Commission”) approve a recovery mechanism for expenditures related to its Oklahoma Grid Enhancement Plan (“Plan”). In this Plan, OG&E proposes to recover the return on and of \$810.2 million in capital projects through a rate rider, until such time OG&E files a base rate case and the costs will be reviewed for prudence. OG&E proposes this Plan would improve reliability by reducing average customer outage duration by 60%. The Plan would take place over a five-year period in which OG&E would file annual spending plans with the Commission and submit quarterly revisions of its rider tariff to the Public Utility Division (“PUD”) for recovery of in-service projects.

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customers, and alternative regulatory recovery options for Plan expenditures to reach its recommendations.

Following this review, PUD finds the following:

- **Rider Request:** The OG&E Plan, as filed, does not meet the three criteria for establishing a rider, which requires that costs be: (1) largely outside the control of a utility; (2) unpredictable and volatile; and (3) substantial and recurring. OG&E distribution capital replacements program is a normal utility expenditure that is within the Company's control, stable, and a part of its base rate recovery. Unpredictable weather event costs already receive extraordinary cost recovery through the Storm Cost Recovery Rider. The Rider would need to be modified to cover only those expenses that meet the criteria for rider recovery.
- **Review Costs in General Rate Case Prior to Cost Recovery:** OG&E has been investing in grid enhancement for over a decade through its System Hardening and Smart Grid programs. While these programs were granted riders for cost recovery, this was in response to special circumstances which were substantial and outside the utility's control. General rate cases will allow the Commission to review the costs of used and useful Plan projects in conjunction with any avoided costs or other offsetting savings in OG&E's Cost of Service. OGE must provide additional support as to why the costs would not be properly handled through a general rate case filing.
- **Reduce Annual Plan Cost:** OG&E's Plan could cause the average residential customer bill to increase by \$7.06 per month or \$84.72 per year in the year 2025 in order to experience an hour and half decrease to average outage duration. OG&E also intends to make non-Plan related investments during the same period which could lead to additional rate increases. Furthermore, it is not clear that OG&E's reliability is worse than national or regional averages or is worsening due primarily to aging infrastructure. The combined impact of the Company's Plan, additional base rate increases, and possible unusual expense recovery and customer impacts related to COVID-19 should be considered. Reducing the annual Plan cost would allow the Company to make needed investments while limiting rate increases.

If the Commission approves a rider for OG&E, PUD recommends the rider include the following provisions:

1. **Limit Scope:** The rider should only include special recovery of distribution projects related to safety and reliability, such as distribution projects that are not normal distribution replacements, recovery of capital related costs (i.e., no operations and maintenance expense, distribution projects directly related to reliability and/or safety).
2. **Hard Cost Cap:** Limit recovery to a maximum revenue requirement cost cap

- 1 on an annual basis.
- 2 3. **Limit Timeline:** The rider should have an unambiguous expiration date that
- 3 allows for full rate case review of the utility's total cost of service.
- 4 4. **Positive NPV:** Recovery should be limited to projects with a positive net
- 5 present value prior to consideration of avoided economic harm benefits.
- 6 5. **Review Prior to Cost Recovery:** OG&E should be required to submit the rider
- 7 and associated projects to PUD for review and verification prior to beginning
- 8 cost recovery. The effective date of tariff rates should be a minimum of 45 days
- 9 following submission from OG&E to PUD.

10 **INTRODUCTION**

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

12 A: My name is Kathy Champion. My business address is Oklahoma Corporation

13 Commission, Public Utility Division, Jim Thorpe Office Building, Room 580, 2101 North

14 Lincoln Boulevard, Oklahoma City, Oklahoma 73105.

15 **Q: Have you previously testified before the Commission and were your qualifications**

16 **accepted?**

17 A: Yes. I have previously testified before the Commission and my qualifications were

18 accepted at that time.

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

20 A: I am employed by the Oklahoma Corporation Commission Public Utility Division as an

21 Energy Coordinator.

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

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

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

2 A: My principal responsibility is to audit and analyze utility applications, reports, financial
3 records, and all workpapers to assist PUD in making accurate recommendations to the
4 Commission. My primary responsibilities relate to energy efficiency programs, policies,
5 and cost of service and rate design reviews for both electric and gas utilities. Additionally,
6 as a PUD coordinator I lead a team of regulatory analysts who also work to analyze utility
7 applications and assist PUD in making accurate recommendations. For a complete list of
8 my work history and educational background, please review the attached curriculum vitae.¹

9 **PURPOSE**

10 **Q: What is the purpose of this Responsive Testimony regarding the Application filed by**
11 **OG&E for an order of the Commission approving a recovery mechanism for**
12 **expenditures related to the Plan as filed in Cause No. PUD 202000021?**

13 A: The purpose of my testimony is to explain PUD's review of the proposed Plan, including:
14 comparison of OG&E's reliability to regional and national trends, evaluation of the costs of
15 the Plan in light of OG&E's other projected investments, discussion of PUD's opposition to
16 a rider as the recovery mechanism for the Plan, and PUD's alternative recommendations for
17 a rider if one is ultimately approved by the Commission.

18 **PUD'S REVIEW PROCESS**

19 **Q: How was this Responsive Testimony developed?**

¹ Exhibit KC-1.

1 A: Senior Public Utility Regulatory Analyst Zachary Quintero performed the initial analysis
2 and developed many of the positions described in this testimony in collaboration with PUD
3 attorneys and under the supervision of myself and other PUD managers. As Mr. Quintero
4 is no longer available to present this testimony, I completed the review and present PUD's
5 position.

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

7 A: PUD reviewed the Application and Direct Testimony filed in this Cause on February 24,
8 2020, the Errata Testimony filed on April 24, 2020 and the Supplemental Testimony filed
9 on July 31, 2020. The Company's supporting testimony detailed its reasoning for seeking
10 recovery of expenses related to the Plan, analysis of aging infrastructure's impact on
11 reliability, development of Plan principles and spending targets, and how the Plan expenses
12 would be recovered. PUD reviewed the data requests sent by all intervenors and the
13 responses to those data requests by OG&E. PUD also held discussions with OG&E staff
14 through video conferencing software with virtual document sharing capabilities. These
15 conferences were held to increase PUD's understanding of the information presented in the
16 Application, including workpapers and models used to develop the Plan.

17 PUD reviewed data concerning service reliability and grid modernization from the U.S.
18 Energy Information Administration ("EIA") and U.S. Department of Energy ("DOE").
19 PUD compared OG&E's service reliability to national and regional averages to understand
20 how OG&E compares to other utilities in the U.S. OG&E's projected capital expenditures
21 were also reviewed to understand the context of the projected rate increases from this Cause

in consideration with other possible future rate increases. PUD compared OG&E's Plan and past expenditures to other grid modernization plans in the U.S. and evaluated OG&E's aging infrastructure impact on its reliability metrics.

Q: Are there any other PUD witnesses filing Responsive Testimony in this Cause?

A: Yes. The table below notes each PUD witness and the subject their testimony will discuss in this Cause.

Witness	Subject
John Givens	Aging Infrastructure and Reliability Improvement Analyses
David Melvin	Comparable Grid Modernization Efforts
Kathy Champion	Cost of Plan, EIA Reliability Comparison, and Proposed Rider

OG&E GRID ENHANCEMENT PLAN

Q: Please briefly summarize OG&E's Plan.

A: OG&E has proposed a five-year, \$810 million Plan² that is "...focused on the [upgrading] and replacement of aging equipment, hardware, and other assets...."³ OG&E would develop annual spending plans pursuant to Company objectives, including "(1) improved reliability, (2) greater resiliency, (3) enhanced flexibility, (4) increased efficiency, (5) additional affordability, and (6) expanded customer benefits."⁴ The Plan would be provided to the Commission on an annual basis,⁵ and quarterly submissions would be submitted to PUD containing the projects placed in service to be recovered through the rider. According to OG&E's Plan, PUD "may determine if projects conform to the terms

² Direct Testimony of Zachary Gladhill, page 10.

³ Direct Testimony of Don Rowlett, page 4

⁴ Direct Testimony of Kandace Smith, Page 4.

⁵ Direct Testimony of Don Rowlett, Page 6.

1 of the rider and ensure the calculation of the quarterly factor and monthly over/under
2 balance is reasonable. However, the Commission will be the final determination of project
3 approval in OG&E's next general rate case.”⁶

4 Using an analysis of OG&E's grid modernization efforts in Arkansas,⁷ OG&E is assuming
5 its Oklahoma Grid Enhancement Plan will produce average reliability improvements of
6 60%.⁸ The Company claims this will result in avoided storm and non-storm O&M of \$120
7 million and avoided capital costs of \$380 million.⁹ In addition, OG&E estimates its
8 “customers stand to avoid approximately \$1.4 billion in economic harm benefits over the
9 next 30 years....”¹⁰ OG&E claims the plan will increase the average customer bill by
10 1.15%, or \$1.11 per month, in 2021¹¹ and “below 1.7%” for each year thereafter through
11 2024.¹²

12 **Q: How is the proposed Plan different from OG&E's normal distribution replacements?**

13 A: OG&E already deploys components of an enhanced grid, such as automation, through the
14 normal capital expenditure process financed through base rates. However, OG&E intends
15 to use the Plan dollars to accelerate equipment upgrades and replacements in order to more
16 quickly realize possible future benefits.”¹³ In his Responsive Testimony, PUD witness
17 David Melvin further explains grid modernization and how OG&E has already begun this

⁶ OG&E Response to PUD Data Request ZIQ 1-9.

⁷ OG&E Response to Attorney General Data Request AG 6-4.

⁸ Direct Testimony of Kandace Smith, Page 5.

⁹ Direct Testimony of Zachary Gladhill, Page 17.

¹⁰ Id. at Page 18.

¹¹ Errata to the Direct Testimony of Donald Rowlett, page 12

¹² Direct Testimony of Donald Rowlett, pages 12-13.

¹³ OG&E Response to AG Data Request AG 2-13.

process.

Q: How much of OG&E's projected capital expenditures are related to this Plan?

A: Table 1 shows OGE Energy's company-wide projected capital expenditures as portrayed in its March 2020 Investor Update with the annual Plan investment amounts identified at the bottom. The Plan investments amounts are part of the total listed in each year included with the table.

Table 1: OGE Energy Projected Investments

	<i>Millions of dollars</i>					
	2020	2021	2022	2023	2024	Total
Transmission	45	40	35	35	35	190
OK Distribution	215	225	225	225	225	1,115
AR Distribution	30	15	15	15	15	90
Generation	135	60	60	90	60	405
Reliability, resiliency, technology, and other	90	335	335	335	335	1,430
Other	60	50	60	55	55	280
Total	575	725	730	755	725	
OK Grid Enhancement	89	172	183	183	183	810

Q: Could the non-Plan investments incentivize OG&E to seek a rate increase by 2024?

A: Yes. Using OG&E's projected investments, approved depreciation expense, and Oklahoma plant jurisdictional allocation factor, PUD believes it is likely OG&E will seek a rate increase for approximately \$549 million in additional plant investment by 2024. To calculate this figure, PUD started with the March 2020 Investor Update, removed the Plan costs, removed non-jurisdictional costs, applied the approved Plant in Service allocation factor, and subtracted the annual depreciation expense embedded in base rates. Table 2 demonstrates this calculation.

Table 2: Estimated Additional Oklahoma Capital Investments

	<i>Millions of dollars</i>					
	2020	2021	2022	2023	2024	Total
OK Total Excluding Grid Enhancement, AR Distribution, Transmission	411	498	497	522	492	2,420
OK Plant Allocation Factor	90.44%	90.44%	90.44%	90.44%	90.44%	
OK Plant Allocated	372	450	449	472	445	2,189
2019 OK Annual Depreciation Expense	328	328	328	328	328	1,640
Net Additions Excluding Grid Enhancement	44	122	121	144	117	549

Q: Why is the \$549 million estimate reasonable?

A: PUD utilized OG&E's stated capital investment projections and made reasonable adjustments for costs which might not be included in net rate base. In addition, PUD compared the net rate bases proposed in OG&E's Application from 2015¹⁴ and 2018¹⁵ rate cases. During that period, OG&E's rate base increased by approximately \$1.326 billion. Even without consideration of the \$534 million cost of the Sooner Scrubbers,¹⁶ OG&E's rate base still grew by approximately \$792 million over approximately three years.

Q: Why is this estimate relevant to OG&E's proposed Plan?

A: The estimate demonstrates how the customer impact of OG&E's Plan cannot be viewed in isolation from other investments OG&E intends to undertake during the same time period as the proposed Plan. OG&E has stated that its Plan was developed under the assumption

¹⁴ Cause No. PUD 201500273.

¹⁵ Cause No. PUD 201800140.

¹⁶ Cause No. PUD 201800140, Direct Testimony of Donald R. Rowlett, Page 8.

1 that rate cases have typically been filed every “one to two years.”¹⁷

2 **Q: What is the possible cost impact of this Plan on OG&E’s customers without**
3 **consideration of other future investments?**

4 A: As provided by OG&E in the Notice of Hearing¹⁸ the estimated impacts to customers will
5 be:

6 Average Residential Customer: 0.10% in 2020; 1.15% in 2021; 2.91% in 2022;
7 4.60% in 2023; 6.23% in 2024 and 7.29% in 2025.

8 This equates to an approximately \$0.32 per month between September and
9 December in 2020; \$1.11 per month in 2021; \$2.82 per month in 2022; \$4.45 per
10 month in 2023; \$6.03 per month in 2024; and \$7.06 per month in 2025.

11 On average, General Service customers may see a total bill increase of
12 approximately 0.11% in 2020; 1.21% in 2021; 3.01% in 2022; 4.75% in 2023;
13 6.44% in 2024; and 7.56% in 2025.

14 For the industrial rate classes, the average total bill for the Power and Light (PL)
15 class may increase 0.07% in 2020; 0.72% in 2021; 1.82% in 2022; 2.88% in 2023;
16 3.90% in 2024; and 4.56% in 2025.

17 The average total bill for the Large Power and Light class (LPL) may increase
18 0.02% in 2020; 0.26% in 2021; 0.74% in 2022; 1.16% in 2023; 1.56% in 2024; and
19 1.78% in 2025.

20 All customer impacts are cumulative increases over the five-year period as
21 compared to current rates.

22 **Q: Does cost alone justify approval or denial of OG&E’s proposed Plan in this Cause?**

23 A: No. PUD compared OG&E’s current reliability metrics to national and regional trends,
24 reviewed OG&E’s aging equipment contribution to SAIDI analysis, surveyed grid
25 modernization efforts around the nation, and evaluated the cost of the Plan in order to make

¹⁷ OG&E Response to Attorney General Data Request 7-4.

¹⁸ PUD Cause No. 202000021, Order No. 713998.

its recommendation. PUD’s review of aging infrastructure contributing to its SAIDI score is discussed in the Responsive Testimony of PUD witness John Givens, and the survey of grid modernization efforts is discussed in the Responsive Testimony of PUD witness David Melvin.

OG&E SERVICE RELIABILITY

Q: How is utility service reliability commonly measured?

A: Two common measures of electric service reliability are:¹⁹

- SAIDI: The System Average Interruption Duration Index is the “most often used performance measurement for a sustained interruption. ... This index measures the total duration of an interruption for the average customer during a given time period.”
- SAIFI: The System Average Interruption Frequency Index “is the average number of times that a system customer experiences an outage during the year (or time period under study).”

Q: What are OG&E’s recent reliability metrics?

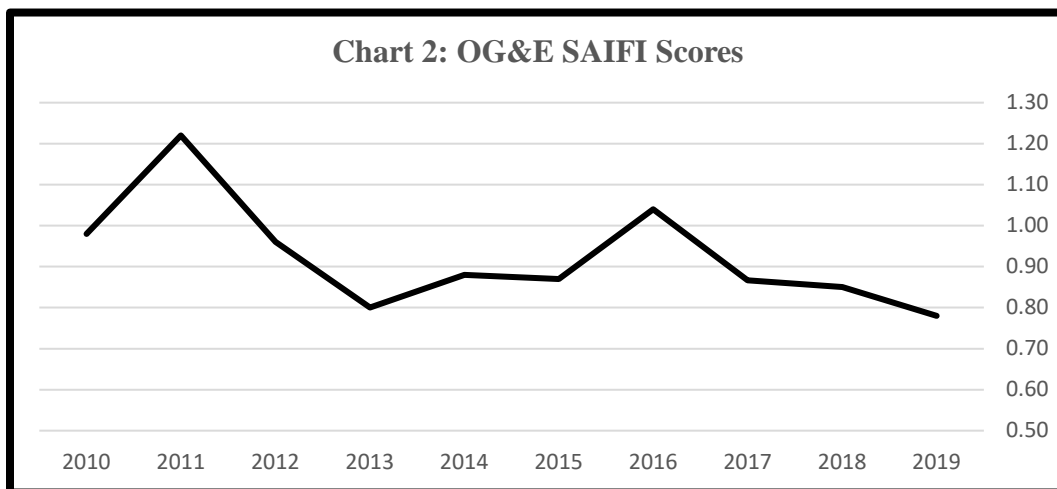
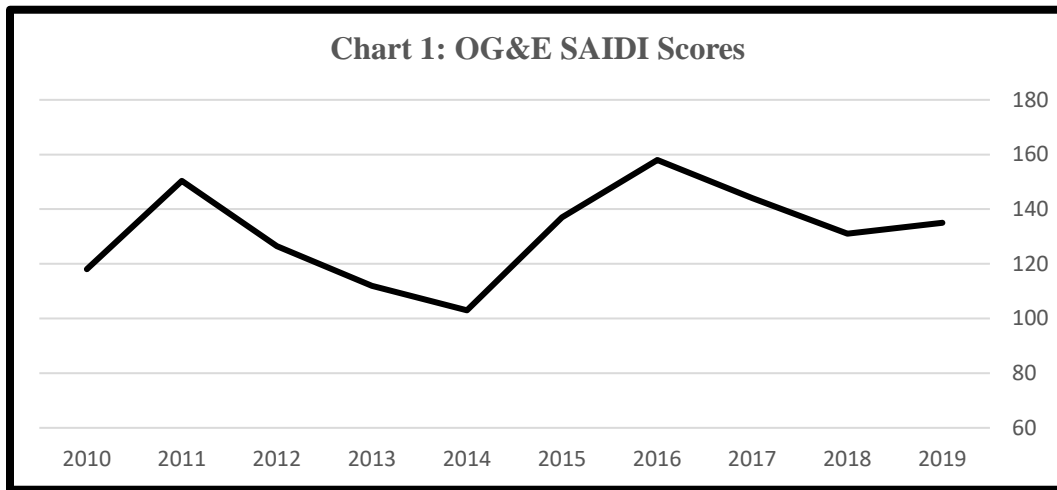
A: Table 3 displays OG&E’s SAIDI and SAIFI scores for the past ten years using the Annual Reliability Reports submitted to the Commission pursuant to OAC 165:35-25. This data will serve as the benchmark for PUD’s comparative analysis.

Table 3: OG&E SAIDI and SAIFI Scores

Reporting Period	SAIDI	SAIFI
2019	135	0.78
2018	131	0.85
2017	144	0.87
2016	158	1.04
2015	137	0.87
2014	103	0.88
2013	112	0.80

¹⁹ National Association of Regulatory Utility Commissioners. (n.d.). Reliability. Retrieved from <https://www.naruc.org/servingthepublicinterest/about/reliability/>.

2012	127	0.96
2011	150	1.22
2010	118	0.98



1 **Q: Do these SAIDI and SAIFI scores include major events or storms?**

2 **A: No.**

3 **Q: Why did PUD use the reliability metrics contained in OG&E Annual Reliability**
4 **Reports instead of other sources?**

5 **A: OG&E provided numerous reliability metrics in response to data requests issued by all**
6 **parties in this Cause. These metrics measured reliability based upon various criteria, such**

as geographic region and system components,²⁰ or for the purpose of calculating incentive compensation.²¹ Ultimately, PUD chose to use the Annual Report metrics because the Commission, by requiring submission of the report along with the metrics and relevant criteria contained therein, have indicated the importance of that particular evaluation.²²

Q: What do the trends in Charts 1 and 2 indicate regarding OG&E's reliability?

A: OG&E's outage duration per average customer (SAIDI) clearly improved from 2011 to 2014, worsened from 2014 to 2016, and improved again from 2016 to 2019. Outage frequency (SAIFI) per average customer followed a similar trend.

Q: How do these scores compare to other utilities?

A: PUD used data available from the EIA to compare OG&E's reliability metrics to the national and regional average for investor owned utilities for the years 2013 through 2018. These are the most recent years for which uniform data is available from the EIA. PUD developed a regional average by including Oklahoma and any state that shares a geographic border with Oklahoma in the metric. Table 4 and Chart 3 compare OG&E's SAIDI metrics against the EIA national and regional average while Table 5 and Chart 4 do the same for SAIFI.

Table 4: OG&E and EIA SAIDI Metrics

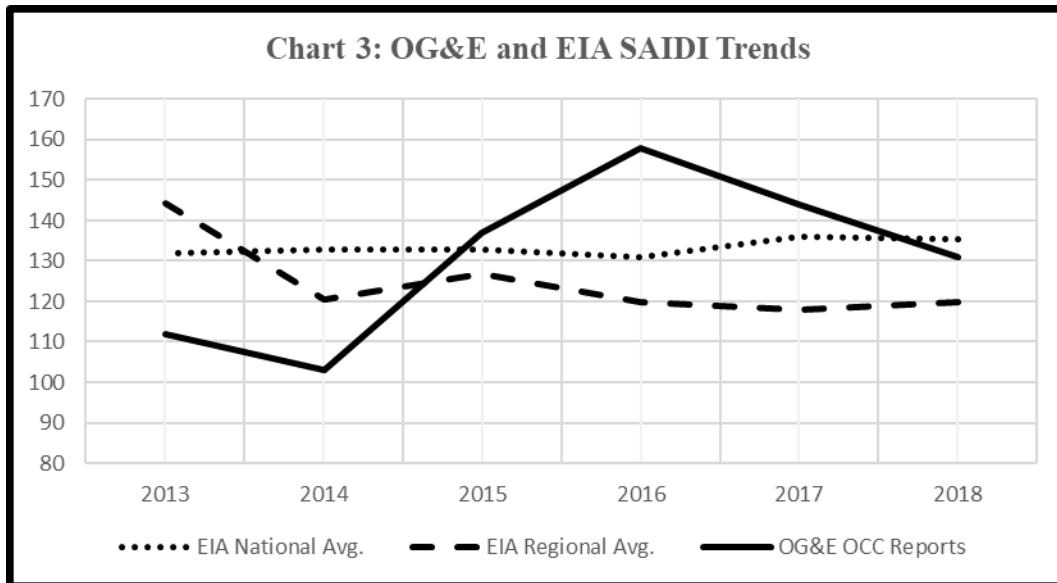
Year	OG&E	EIA Regional	EIA National
2018	131	135	120
2017	144	136	118

²⁰ OIEC Data Requests 2-2 through 2-8.

²¹ AG Data Request 1-23.

²² OAC 165:35-25-20.

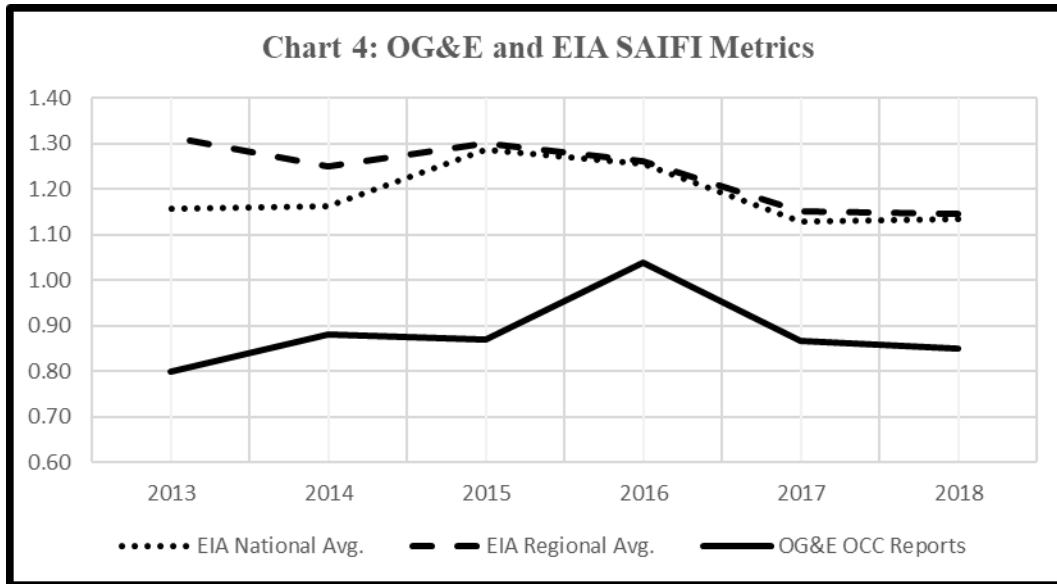
2016	158	131	120
2015	137	133	127
2014	103	133	120
2013	112	132	144



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Table 5: OG&E and EIA SAIFI Metrics

Year	OG&E	EIA Regional	EIA National
2018	0.85	1.14	1.15
2017	0.87	1.13	1.15
2016	1.04	1.26	1.26
2015	0.87	1.29	1.30
2014	0.88	1.16	1.25
2013	0.80	1.16	1.31



1 **Q: What do these comparisons indicate regarding OG&E’s reliability?**

2 A: OG&E’s outage duration was worse than the national and regional average for three of the
 3 six years reviewed and better than those averages for the remaining three of six years
 4 reviewed. OG&E’s outage frequency has fluctuated during the same review period but
 5 was at least 20% better than the national average.²³

6 **Q: Why did PUD not include the years 2010, 2011, 2012, or 2019 in its EIA comparison?**

7 A: EIA publishes its Annual Electric Power Industry Report for the prior year each October,
 8 therefore, 2019 data will not be available until October 2020. EIA only began publishing
 9 SAIDI and SAIFI data with this report in 2013.²⁴

10 **Q: Given those limitations, why did PUD use EIA to benchmark OG&E’s SAIDI and**

²³ Calculated by comparing the 2016 OG&E SAIFI value to the EIA national and regional average.

²⁴ Energy Information Administration. (2020, March 16). Annual Electric Power Industry Report, Form EIA-861 detailed data files. Retrieved from <https://www.eia.gov/electricity/data/eia861/>.

1 **SAIFI metrics?**

2 A: EIA uniformly collects a significant amount of operational data from electric utilities
3 throughout the United States and is widely used throughout the energy industry as a source
4 of historical and forecasted information. EIA's data set allowed PUD to perform a
5 comparison with a large, diverse list of utilities, controlled for investor-owned utility
6 status²⁵ and geographic location. Furthermore, including the years 2010-2012 is unlikely
7 to have a dramatic impact upon the trend analysis seen in Charts 3 and 4.

8 **Q: How is OG&E's aging equipment impacting SAIDI?**

9 A: OG&E claims that "equipment failure due to aging infrastructure is currently the number
10 one cause of outages on our system and second to weather is the second highest contributor
11 to SAIDI."²⁶ While OG&E claims that aging equipment is "...becoming a greater portion
12 of the overall SAIDI minutes...",²⁷ this trend has not necessarily led to worsening SAIDI
13 per average customer. As seen in Chart 1 of this testimony, OG&E's SAIDI has fluctuated
14 up and down between 100 and 140 minutes per average customer since 2014, which OG&E
15 claims has been the same period during which its aging equipment contribution to SAIDI
16 has increased. As demonstrated in Table 6, equipment outage accounts for nearly the same
17 percentage of total per customer average SAIDI in 2019 as it does in 2013. During the
18 same time period, average per customer SAIDI caused by vegetation has nearly doubled.

²⁵ Other EIA ownership classifications include Cooperative, Municipal, and State.

²⁶ Direct Testimony of Zachary Gladhill, Page 7.

²⁷ OG&E Response to PUD DR ZJQ 2-5.

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Table 6: OG&E Annual SAIDI by Outage Type²⁸

Year	Animals	Blank	Equipment	Other	Vegetation	Weather	Total
2013	4.65	0.53	36.36	14.26	14.04	41.75	111.59
	4.17%	0.48%	32.58%	12.78%	12.58%	37.41%	100.00%
2014	7.55	0.09	40.21	8.15	12.99	34.18	103.16
	7.32%	0.08%	38.98%	7.90%	12.59%	33.14%	100.00%
2015	6.86	0.02	44.12	12.47	25.53	48.20	137.21
	5.00%	0.01%	32.16%	9.09%	18.61%	35.13%	100.00%
2016	8.54	0.31	51.53	11.98	21.57	64.46	158.39
	5.39%	0.20%	32.53%	7.56%	13.62%	40.69%	100.00%
2017	8.29	-	43.77	7.62	27.27	56.94	143.90
	5.76%	0.00%	30.41%	5.30%	18.95%	39.57%	100.00%
2018	9.80	-	41.82	9.29	18.83	51.19	130.93
	7.48%	0.00%	31.94%	7.10%	14.38%	39.10%	100.00%
2019	6.87	-	45.95	2.61	31.62	48.34	135.39
	5.08%	0.00%	33.94%	1.93%	23.35%	35.70%	100.00%

2 The Responsive Testimony of PUD witness John Givens further explains why the aging
3 equipment contribution to SAIDI may not justify OG&E's proposed Plan.

4 **Q: Would an increasing percentage of aging equipment contributing to worsening SAIDI**
5 **and SAIFI scores support increased spending on aging infrastructure?**

6 A: Yes. However, that trend should be viewed in context with overall SAIDI and SAIFI
7 metrics to determine if overall reliability is improving or deteriorating. If such a trend were
8 occurring, the utility may be able to cut expenditures from other categories that are
9 contributing less to reliability issues over time. Theoretically, aging infrastructure could
10 contribute to 100% of a utility's overall SAIDI and SAIFI metrics. But if those metrics
11 were far better than the national and regional average, increasing spending on aging
12 equipment may not be justified. Therefore, the appropriate Plan spending level should be

²⁸ OG&E Response to PUD DR ZJQ 2-6; percent to total calculated by PUD and bold emphasis added.

determined with consideration to those comparisons.

Q: Does PUD oppose OG&E increasing its capital expenditures to improve its reliability?

A: No. PUD's primary concern is ensuring safe and reliable service at the lowest reasonable cost in compliance with all applicable rules and statutes. PUD must also balance the interests of the Company and its ratepayers. The proposed Plan includes projects that are projected to improve reliability and have a positive NPV for customers. However, based on the filed information and review, they are more appropriate to include as part of OG&E's base rate capital expenditure plan as opposed to the proposed rider. The Responsive Testimony of PUD witness David Melvin further discusses the possible benefits of grid enhancement.

Q: What investments has OG&E made to improve its grid reliability in the past?

A: OG&E has recovered \$69.4M from its ratepayers through riders to implement its System Hardening plan²⁹ from 2009 to 2017. OG&E also recovered \$151.4M from ratepayers between 2010 and 2017 through riders to implement its Smart Grid plan.^{30,31}

Q: Are these programs part of grid enhancement and modernization efforts utilized by utilities across the nation?

A: Yes. As further explained in the Responsive Testimony of PUD witness David Melvin,

²⁹ Cause No. PUD 200800387.

³⁰ Cause No. PUD 201000029.

³¹ OG&E Response to PUD Data Request ZJQ 1-2.

OG&E has already begun enhancing its grid by implementing System Hardening and Smart Grid.

Q: If implemented as proposed, how could OG&E's Plan impact reliability for the average customer?

A: As of 2019, the average customer experiences about one outage per year (lasting longer than five minutes) and a total outage time just over two hours, excluding major events. If Plan costs and benefits were realized as proposed, the average customer would experience about one outage per year with a total outage time of just over one hour.³² OG&E projects outage durations including major storms will be decreased by just over two hours.³³ As referenced previously, these outage time reductions come at a cost of \$84.72 per year (or \$7.06 per month) by 2025.

Q: Did PUD review the Company's projected benefits associated with the Grid Enhancement Plan?

A: Yes, OG&E has estimated that \$1.9 billion in quantifiable benefits would result from implementation of the proposed Grid Enhancement Plan. Of the \$1.9 billion in projected benefits, approximately \$500 million is attributed to future avoided cost of service due to decreased capital and labor expenditures by the Company. The remaining \$1.4 billion is a product of the DOE ICE calculator, which provides an estimate of the general impact of service interruptions in terms of avoided economic harm to the end-use customer. PUD witness John Givens provides more information on PUD's review of the Company's

³² OG&E Response to OIEC Data Request 2-16.

³³ Ibid.

1 projected benefit models.

2 While the Company's projection may show an overall economic benefit to the system,
3 PUD is concerned that there is a disparity between the classes in both the cost to produce
4 that benefit and the customers receiving it. To illustrate, the Company provided the
5 following distribution of customer benefits by class from the ICE calculator:³⁴

Distribution of Benefits		
	# customers	Total Benefit
Residential	690,730	\$ 42,448,953
Small C&I	101,232	\$ 1,041,203,910
Med & Large C&I	13,906	\$ 832,279,017
	805,868	\$ 1,915,931,880

6 As shown, residential customers will receive only \$42 million in avoided economic harm
7 benefit, or approximately 2% of the total benefit from the ICE calculator.

8 Likewise, assuming the avoided cost of service benefits would flow similarly to the current
9 cost allocation, residential customers would receive 46-60% of the estimated \$500 million
10 in avoided capital and labor costs, or approximately \$250 million. Combining avoided
11 economic harm and avoided cost of service benefits, residential customers would receive
12 less than \$300 million out of the total projected benefit of \$1.9 billion, or approximately
13 16%. To summarize, using OG&E's analysis, residential customers could be expected to
14 pay approximately 50% of the total cost and receive only 16% of the total benefit.

³⁴ OG&E Response to Attorney General Data Request 3-8.

PROPOSED RECOVERY MECHANISM

Q: Please briefly describe OG&E proposed rate recovery mechanism in this Cause.

A: OG&E has proposed a rider that would collect the cost of capital expenditures in the Plan once the projects are placed in service. OG&E would submit the rider and a report to PUD on a quarterly basis with the projects placed into service. PUD would review the rider to ensure rate accuracy and compliance with the approved tariff. Upon approval of the tariff revision, OG&E would collect costs from customers on an interim basis until reviewed for prudence in a Chapter 70 rate review. If deemed prudent, projects would be moved into base rates with all other Plant in Service. Imprudent costs would be disallowed and refunds would be issued to customers.

Q: Does PUD support a rider for the Plan as proposed?

A: The Plan as currently proposed does not meet the criteria for establishing a rider and allows OG&E to significantly increase costs on customers without a mechanism to flow back any offsetting cost decreases resulting from the Plan. In addition, a rider for normal infrastructure investment can reduce OG&E's risk without a commensurate adjustment in the utility's rate of return.

Q: What are the criteria for establishing a rider?

A: Rate riders, also known as cost trackers, are rate mechanisms that "allow a utility to recover specific costs from customers outside of a general rate case."³⁵ According to Ken Costello of the National Regulatory Research Institute, they have historically arisen from

³⁵ Costello, K. (2014, April). Alternative Rate Mechanisms and Their Compatibility with State Utility Commission Objectives. Retrieved from <https://pubs.naruc.org/pub/FA86C519-AF31-D926-BE12-2AC7AE0CD8D6>.

1 “extraordinary circumstances” that are:

- 2 1. Largely outside the control of a utility;
- 3 2. Unpredictable and volatile (e.g., unable to estimate the cost within a tolerance level
- 4 in a general rate case); and
- 5 3. Substantial and recurring (e.g., the difference between test-year cost and actual cost
- 6 can materially affect a utility’s rate of return).³⁶

7 **Q: Does OG&E’s rider fit these criteria?**

8 A: The rider as filed does not meet the criteria. The Company’s ability to manage its capital
9 expenditures and O&M expenses to address reliability are a known and measurable
10 expense that are considered in its base rates during a Chapter 70 review. Other than
11 extreme weather events (major events or storms), these are within the control of the utility,
12 predictable, and not volatile. If properly budgeted, these expenses should not materially
13 impact the Company’s rate of return.

14 **Q: Does OG&E have a rider to address unpredictable and volatile storm events outside**
15 **the control of a utility?**

16 A: Yes. The Storm Cost Recovery Rider was established in 2008³⁷ to recover significant
17 storm costs that occurred in 2007. It has been renewed in multiple rate cases since that
18 time and is trued-up on an annual basis.³⁸

19 **Q: Were riders approved for OG&E’s Smart Grid and System Hardening plans?**

20 A: Yes. OG&E’s Smart Grid program resulted from a Department of Energy grant which

³⁶ Ibid.

³⁷ Cause No. PUD 200800215, Order No. 558445

³⁸ Cause Nos. PUD 201100087, 201500273, and 20170046.

1 required OG&E to spend or accrue the project costs by December 29, 2012.³⁹ This grant
2 provided \$130 million⁴⁰ of the projected \$366 million⁴¹ program cost. The limited
3 availability of the grant and the strict spending deadline was outside the utility's control,
4 creating the need for an extraordinary rate recovery mechanism to ensure the program
5 could be implemented in a timely manner.

6 The System Hardening plan was a result of a Commission-approved settlement agreement
7 which required OG&E to undertake a "catch-up" vegetation management program in order
8 to start and maintain a four-year tree trim cycle in addition to other "aggressive" vegetation
9 management tactics.⁴² This agreement required exceptional expenses that were beyond
10 OG&E's level in base rates.

11 **Q: Does lack of a rider prevent OG&E from enhancing or modernizing its grid?**

12 A: No. OG&E's base rates allow for continual infrastructure investments. OG&E has a total
13 of \$328.1M in annual depreciation expense as of 2019,⁴³ with \$79.2M allocated to FERC
14 accounts 360-368,⁴⁴ the accounts identified by OG&E to be impacted by the proposed Plan
15 (excluding General and Intangible Plant).⁴⁵

16 **Q: Has the Commission disallowed recent base rate distribution investments?**

³⁹ Cause No. PUD 201000029, Order No. 576595, page 5 of 21.

⁴⁰ Id. at page 9 of 21.

⁴¹ Id. at page 5 of 21.

⁴² Cause No. PUD 200800387, Order No. 567670, page 3 of 9.

⁴³ OG&E Witness Cash workpaper "Okla PUD 201800140 (SETTLED COS).xlsm," [Tab] DEPR EXP (DE).

⁴⁴ Ibid.

⁴⁵ Direct Testimony of Gwin Cash, Page 6.

1 A: No. Since 2015, the Commission has not disallowed any distribution system investments
2 that OG&E's requested for inclusion in its three general rate cases.⁴⁶

3 **Q: Did net Plant in Service increase for FERC accounts 360-368 during that time period?**

4 Yes. Plant in Service for these accounts increased by 17.7%, from \$2.053 billion to \$2.417
5 billion.⁴⁷ OG&E has also added 32,821 customers from 2015 to 2019.⁴⁸

6 **Q: How does regulatory lag impact OG&E's ability to finance the Plan?**

7 A: Base rates are only sufficient to support a certain amount of annual investment. In general,
8 if a utility's annual new investments outpace its depreciation expense, its current rates will
9 not support providing the authorized rate of return on those new investments. Put another
10 way, when Plant in Service and accumulated depreciation remain exactly equal, there is no
11 need to change the revenue requirement.⁴⁹ By choosing to make these distribution grid
12 investments on an accelerated basis,⁵⁰ OG&E's current rates may not sustain the
13 investment until rates are changed in a future case.

14 **Q: Does regulatory lag prevent OG&E from enhancing or modernizing its grid?**

15 A: No. Just as regulatory lag does not prevent OG&E from constructing generation assets to
16 meet load obligations, OG&E can execute grid enhancement through base rates and receive
17 recovery for costs in a future proceeding. OG&E also acknowledges it may also be able to

⁴⁶ OG&E Response to PUD Data Request ZJQ 1-7.

⁴⁷ Cause No. 201500273 test year net plant compared to Cause No. PUD 201800140 post-test year net plant.

⁴⁸ OG&E Response to PUD Data Request ZJQ 2-6.

⁴⁹ Electricity Regulation in the US; A guide, RAP

⁵⁰ OG&E Response to Attorney General Data Request 2-13/.

1 reduce its regulatory lag by extending the length of the Plan period from 5 years to 10 years
2 or longer.⁵¹

3 **Q: How does Allowance for Funds Used During Constructions (“AFUDC”) impact**
4 **OG&E’s ability to execute its Plan?**

5 A: AFUDC allows OG&E to accrue carrying costs for major projects before they are in service
6 and then move those carrying costs to rate base upon completion of the project and approval
7 by the Commission.⁵² Because AFUDC has only been applied to projects with a length of
8 greater than 30 days, many of OG&E’s proposed projects may not qualify for AFUDC
9 treatment.⁵³ However, this has not prevented OG&E from allocating capital to its current
10 distribution investment plan under base rates. Barriers to investment created by this
11 situation could also be alleviated by lengthening the Plan and reducing the amount of
12 necessary annual capital.

13 **Q: Is there anything proposed in the rider which would directly credit the benefits of**
14 **avoided O&M, capital, or economic harm to customers?**

15 A: No.⁵⁴ Instead, OG&E estimates its future cost to serve its customers would be higher if
16 this work were not performed,⁵⁵ but these benefits are not guaranteed without a consistent
17 rate mechanism to return these avoided costs to customers.

⁵¹ OG&E Response to OIEC 5-1(e).

⁵² Lazar, J. (2016). Electricity Regulation in the US: A Guide. Second Edition. Montpelier, VT: The Regulatory Assistance Project. Retrieved from <http://www.raponline.org/knowledge-center/electricityregulation-in-the-us-a-guide-2>

⁵³ Direct Testimony of Donald Rowlett, Page 8.

⁵⁴ OG&E Response to OIEC Data Request 7-9.

⁵⁵ OG&E Response to PUD Data Request 1-13.

RECOMMENDED LIMITATIONS ON PLAN

Q: Does PUD support recovery of OG&E's Plan costs through a rider?

A: The Plan, as filed, does not meet the necessary criteria for a rider described above. The issues raised in the testimonies filed by PUD would need to be addressed in order to remedy the shortcomings and gain recommendation for approval.

Q: In absence of a rider, would PUD support implementation of the Plan through base rates?

A: A longer implementation period may allow OG&E the opportunity to recover more costs related to the Plan through base rates. As discussed in the Responsive Testimony of David Melvin, many grid modernization plans throughout the country have implementation periods longer than five years. PUD supports inclusion of any necessary and reasonable distribution investments to support safe and reliable service at the lowest reasonable cost following investigation in a Chapter 70 rate case, however implementing the Plan on a five year time will have a high customer rate impact when non-Plan capital expenditures are also considered.

Q: Could the present economic situation imposed by the spread of COVID-19 impact customer ability to absorb rate increases at this time?

A: Yes, it is likely that many customers could be negatively impacted by the on-going COVID-19 situation. The Oklahoma Security Employment Commission ("OSEC") estimates that unemployment in Oklahoma had a dramatic rise in April and remains high at the time of this filing. The following table was provided by the OSEC:

June 2020	Unemp. rate*	Labor force*	Employment*	Unemployment*
Oklahoma	6.6%	1,765,773	1,649,171	116,602
United States	11.1%	159,932,000	142,182,000	17,750,000

* Data adjusted for seasonal factors

OKLAHOMA	Unemp. rate*	Labor force*	Employment*	Unemployment*
June '20	6.6%	1,765,773	1,649,171	116,602
May '20	12.6%	1,823,007	1,592,762	230,245
April '20	14.7%	1,776,346	1,515,047	261,299
Mar'20	2.9%	1,829,828	1,776,101	53,727
Feb '20	3.2%	1,844,257	1,785,827	58,430
Jan '20	3.3%	1,845,422	1,784,815	60,607
June '19	3.2%	1,839,224	1,780,170	59,054

* Data adjusted for seasonal factors

In addition, utilities may also experience higher than normal bad debt and other costs due to COVID-19, and the Commission has pending actions to record and address cost recovery of these unusual expenses.⁵⁶ While the Company could not have foreseen these events at the time of its filing, it is reasonable to recommend that the Company consider modifying the total Plan expenditures, extending the length of the Plan's implementation period beyond five years, and evaluating Plan costs through a base rate case prior to allowing cost recovery.

Q: If a rider is approved by the Commission in this Cause, does PUD have recommendations for the rider?

A: Yes. PUD recommends any approved rider contain the following provisions:

- Limit Scope:** The rider should only include special recovery of distribution projects related to safety and reliability, such as distribution projects that are not normal distribution replacements, recovery of capital related costs (i.e., no operations and

⁵⁶ Cause No. PUD 202000050.

1 maintenance expense, distribution projects directly related to reliability and/or
2 safety).

3 2. **Hard Cost Cap:** Limit recovery to a maximum revenue requirement cost cap on
4 an annual basis.

5 3. **Limit Timeline:** The rider should have an unambiguous expiration date that allows
6 for full rate case review of the utility's total cost of service.

7 4. **Positive NPV:** Recovery should be limited to projects with a positive net present
8 value prior to consideration of avoided economic harm benefits.

9 5. **Review Prior to Cost Recovery:** OG&E should be required to submit the rider
10 and associated projects to PUD for review and approval prior to beginning cost
11 recovery. The effective date of tariff rates should be a minimum of 45 days
12 following submission from OG&E to PUD.

13 **Q: Please explain the Limit Scope recommendation.**

14 A: Limiting the scope ensures that recovered costs are limited to those projects which would
15 not have normally taken place through OG&E's base rate distribution replacement and
16 upgrade program.

17 **Q: Please explain the Hard Cost Cap provision.**

18 A: A hard cost cap would limit recovery to a maximum annual revenue requirement in order
19 to balance the interests of the Company and its ratepayers as OG&E continues to make
20 additional investments in other areas of its business and absorb the unusual costs related to
21 COVID-19.

22 **Q: Please explain the Limit Timeline provision.**

23 A: Limiting the implementation period of the Plan ensures customers do not experience
24 multiple years of increasing costs prior to prudence determination in a general rate case.
25 While costs found to be imprudent would ultimately be refunded to customers, this
26 provision would reduce the possibility of inequities between the number of customers that

1 pay those costs and the number which ultimately receive any possible refund.

2 **Q: Please explain the Positive NPV provision.**

3 A: Limiting the rider to projects with a positive NPV prior to consideration of avoided
4 economic harm benefits ensures customers only pay for those projects which have been
5 shown through an assessment of known and measurable benefits and costs to provide a net
6 benefit to customers. As stated previously, while the Plan may provide an overall positive
7 NPV with the inclusion of avoided economic harm benefits, there remains a concern about
8 the disparity in benefits between customer classes paying for the program versus those
9 shown to receive the benefits. At a minimum, including only projects that provide a
10 positive NPV exclusive of avoided economic harm provides additional protection to
11 customers.

12 **Q: Please explain the Review Prior to Cost Recovery provision.**

13 A: This provision would require OG&E to submit the rider for review and approval by PUD
14 prior to commencing cost recovery on in-service projects. This would ensure that projects
15 comply with all provisions of the Commission-approved tariff and allow for any necessary
16 true-up or adjustment rates in the tariff.⁵⁷ To ensure sufficient time for a thorough review,
17 the effective date of tariff rates should be a minimum of 45 days following submission
18 from OG&E to PUD.

19 **Q: Has the Commission required provisions like these in the past?**

⁵⁷ As explained in the Direct Testimony of Company witness Donald Rowlett, Page 11, investments would also be subject to further true-up, as well as possible disallowance and refund, in a future proceeding.

1 A: Yes. Several of these provisions are similar to those included in the Distribution,
2 Reliability, and Safety Rider approved in Public Service Company of Oklahoma's most
3 recent rate case.⁵⁸

4 **RECOMMENDATION**

5 **Q: What is the Public Utility Division's ("PUD") recommendation to the Oklahoma**
6 **Corporation Commission ("Commission") regarding the Application filed by OG&E**
7 **for an order of the Commission approving a recovery mechanism for expenditures**
8 **related to the Plan as filed in Cause No. PUD 202000021?**

9 A: Following this review, PUD finds the following:

- 10 • **Rider Request:** The OG&E Plan, as filed, does not meet the three criteria for
11 establishing a rider, which requires that costs be: (1) largely outside the control
12 of a utility; (2) unpredictable and volatile; and (3) substantial and recurring.
13 OG&E distribution capital replacements program is a normal utility
14 expenditure that is within the Company's control, stable, and a part of its base
15 rate recovery. Unpredictable weather event costs already receive extraordinary
16 cost recovery through the Storm Cost Recovery Rider. The Rider would need
17 to be modified to cover only those expenses that meet the criteria for rider
18 recovery.
- 19 • **Review Costs in General Rate Case Prior to Cost Recovery:** OG&E has
20 been investing in grid enhancement for over a decade through its System
21 Hardening and Smart Grid programs. While these programs were granted riders
22 for cost recovery, this was in response to special circumstances which were
23 substantial and outside the utility's control. General rate cases will allow the
24 Commission to review the costs of used and useful Plan projects in conjunction
25 with any avoided costs or other offsetting savings in OG&E's Cost of Service.
- 26 • **Reduce Annual Plan Cost:** OG&E's Plan could cause the average residential
27 customer bill to increase by \$84.72 by year 2025 in order to experience an hour
28 and half decrease to average outage duration. OG&E also intends to make non-
29 Plan related investments during the same period which could lead to additional
30 rate increases. Furthermore, it is not clear that OG&E's reliability is worse than
31 national or regional averages or is worsening due primarily to aging
32 infrastructure. The combined impact of the Company's Plan, additional base
33 rate increases, and possible unusual expense recovery related to COVID-19

⁵⁸ Order No. 692809, Cause No. PUD 201800097.

1 should be considered. Reducing the annual Plan cost would allow the Company
2 to make needed investments while limiting rate increases.

3 If the Commission approves a rider for OG&E, PUD recommends the rider include the
4 following provisions:

- 5 1. **Limit Scope:** The rider should only include special recovery of distribution
6 projects related to safety and reliability, such as distribution projects that are
7 not normal distribution replacements, recovery of capital related costs (i.e., no
8 operations and maintenance expense, distribution projects directly related to
9 reliability and/or safety).
- 10 2. **Hard Cost Cap:** Limit recovery to a maximum revenue requirement cost cap
11 on an annual basis.
- 12 3. **Limit Timeline:** The rider should have an unambiguous expiration date that
13 allows for full rate case review of the utility's total cost of service.
- 14 4. **Positive NPV:** Recovery should be limited to projects with a positive net
15 present value prior to consideration of avoided economic harm benefits.
- 16 5. **Review Prior to Cost Recovery:** OG&E should be required to submit the rider
17 and associated projects to PUD for review and approval prior to beginning cost
18 recovery. The effective date of tariff rates should be a minimum of 45 days
19 following submission from OG&E to PUD.

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.

/s/ Kathy Champion
Kathy Champion

Oklahoma Gas and Electric Company – Cause No. PUD 202000022

LIST OF EXHIBITS

KC-1

Curriculum Vitae



Kathy Champion

Contact	k.champion@occcemail.com Tel: 405-521-6878 Fax: 405-522-1157	580 Jim Thorpe Building P.O. Box 52000 Oklahoma City, OK 73152
Work Experience	<ul style="list-style-type: none">▶ Oklahoma Corporation Commission, Public Utility Division, Oklahoma City July 2013 - present: Public Utility Regulatory Analyst, Energy Policy Group<ul style="list-style-type: none">• 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<ul style="list-style-type: none">• 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<ul style="list-style-type: none">• 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<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">▶ 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	<ul style="list-style-type: none">▶ 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

This is to certify that on August 25, 2020, a true and correct copy of the above and foregoing, was sent via electronic mail and/or United States Postal Service, postage fully prepaid thereon to the following interested parties:

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