

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

IN THE MATTER OF THE APPLICATION OF)
OKLAHOMA GAS AND ELECTRIC COMPANY)
FOR COMMISSION PREAPPROVAL OF NEW) CASE NO. PUD 2023-000038
GENERATION CAPACITY PURSUANT)
TO 17 O.S. SECTION 286(C))



RESPONSIVE TESTIMONY

OF

CODY ALSUP

AUGUST 31, 2023

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

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EXECUTIVE SUMMARY

On May 31, 2023, Oklahoma Gas and Electric Company (“OG&E” or “Company”) filed its Application for preapproval of new generation capacity pursuant to 17 O.S. § 286(C). The Public Utility Division (“PUD”) of the Oklahoma Corporation Commission (“Commission”) reviewed the Application, the workpapers and testimony filed by OG&E witnesses, and Final Order No. 696007 in Cause No. PUD 201800159. PUD issued data requests and reviewed the responses provided by OG&E, as well as responses to data requests issued by the intervenors to this Case. Additionally, PUD conducted virtual and in-person audit conferences with OG&E personnel to discuss the areas under review in this filing.

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INTRODUCTION

Q: Please state your name and your business address.

A: My name is Cody Alsup. My business address is Oklahoma Corporation Commission, Public Utility Division, Will Rogers Office Building, PUD Suite 414, 2401 North Lincoln Boulevard, Oklahoma City, Oklahoma 73105.

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Q: Have you previously testified before the Commission and were your qualifications accepted?

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

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

2 A: I am employed by the Oklahoma Corporation Commission Public Utility Division as a
3 Senior Regulatory Analyst.

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

5 A: I have been employed by the Commission since January 2019.

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

7 A: I conduct research and perform comparative analysis of utility applications, reports,
8 financial records, and workpapers to ensure that PUD can make accurate recommendations.
9 My work focuses on analyzing and making recommendations for electric, wind, water, and
10 gas cases. I also analyze and make recommendations for Oklahoma Universal Service
11 Fund Primary cases. For a complete list of my work history and educational background,
12 please review the attached curriculum vitae.¹

13 **PURPOSE**

14 **Q: What is the purpose of your Responsive Testimony regarding the Application filed by**
15 **OG&E for preapproval of new generation capacity in Case No. PUD 2023-000038?**

16 A: The purpose of my Responsive Testimony is to introduce PUD's witnesses and their areas of
17 review in this case. My Testimony also discusses this Case in general.

¹ Exhibit CRA-1.

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PUD’S REVIEW PROCESS

Q: Please explain PUD’s review process in this Cause.

A: PUD reviewed Final Order 696007 in Cause No. PUD 201800159 and the Direct Testimony and associated workpapers filed by Company witnesses. PUD issued data requests and reviewed the responses, as well as the responses to data requests issued by other parties to this Case. PUD conducted multiple audit conferences with the Company to discuss the areas under review in this filing. During these audit conferences, PUD analysts posed questions to Company witnesses and reviewed documentation requested both on an informal basis and through data requests.

CASE OVERVIEW

Q: What is OG&E requesting in this case?

A: OG&E is requesting the Commission preapprove the addition of two new Combustion Turbines (“CTs”) at the Horseshoe Lake facility in Harrah, Oklahoma. OG&E is also requesting that the Commission find that there was a need for the CTs, reasonable alternatives were properly reviewed and considered, and that the proposed Generation Capacity Rider be approved and implemented for recovery of costs of the CTs.

PUD WITNESSES

Q: Who performed reviews as part of this case on behalf of PUD?

A: PUD had a team of six personnel perform reviews of specific assigned areas in this case. A table of PUD’s witnesses and their areas of review can be seen below:

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Table 1: PUD Witnesses

PUD Witness	Area of Review
Cody Alsup	Lead Analyst
Jason Chaplin	Request For Proposals, Reasonable Alternatives, Need for Renewable Resources
Hannah Hubler	Investment Tax Credits
Farzad Khalili	Revenue Requirement, Customer Impacts
Trent Campbell	Associated Costs
Andrew Scribner	Generation Capacity Rider Tariff

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.



Cody Alsup

Oklahoma Gas and Electric – Case No. PUD 2023-000038

LIST OF EXHIBITS

CRA-1

Curriculum Vitae



Cody Alsup

Oklahoma Corporation Commission, 2101 N. Lincoln Blvd,
Oklahoma City, Oklahoma 73105
(405) 521-2331, Cody.Alsup@occ.ok.gov

Work Experience

Oklahoma Corporation Commission: January 2019 - Present

Public Utility Division (PUD) - Senior Regulatory Analyst

- Perform assigned monthly and annual fuel audits.
- Conduct research and perform comparative analysis of utility applications, reports, financial records, and workpapers to ensure PUD makes accurate recommendations.
- Audit Natural Gas RFP submissions to verify compliance with rules.
- Responsible for the development and support of expert witness testimony involving numerous areas of responsibility in assigned cases.
- Responsible for analyzing, reviewing, and preparing of recommendations/determinations involving the Oklahoma Universal Service Fund on behalf of The OUSF Administrator in the State of Oklahoma.
- Wind Analyst – Responsible for processing wind submissions and ensuring compliance with State statutes and rules. Oversee Notice of Intent to Construct, Annual Report/Fee, Decommissioning.
- Lead Analyst for the following PUD and OSF cases:
 - PUD: 19-072, 19-080, 19-097, 20-092, 21-066, 21-069, 21-127, 22-128, 23-038, 23-041
 - OSF: 18-182, 19-003, 19-008, 19-025, 19-029, 19-033, 19-042, 19-047, 19-054, 19-067, 19-077, 19-078, 19-079, 19-081, 19-085, 19-086, 19-087, 19-108, 19-112, 19-124, 19-132, 21-041, 21-042, 21-075, 21-087, 21-175, 21-176, 21-177, 21-234, 22-003, 22-016, 22-060, 22-149, 22-192, 23-050, 23-060
- Assigned Analyst for the following OSF Primary cases:
 - 19-237, 19-305, 20-008, 20-012, 20-013, 20-014, 20-028, 20-029, 20-046, 20-095, 20-112, 23-119
- Assigned Analyst for the following Rate Adjustment cases:
 - 21-055, 21-063, 21-163, 21-164, 22-093
- Assigned Analyst for the following PBRC cases:
 - 23-012, 23-028
- Assigned Analyst for the following Energy submittals:
 - Monthly Fuel: Oklahoma Natural Gas Co.
 - RFP Submission: Oklahoma Natural Gas Co.
 - Monthly/Annual Water Submissions.

WR Hess FACTOR: June 2018 – November 2018

Accounting System Analyst, Oklahoma City, Oklahoma

- Managed client issues and determined the appropriate resolution with accounting software(s).
- Stayed abreast of current technologies and procedures within Oil and Gas accounting to maximize efficiency and work quality.
- Gained invaluable experience and knowledge of Oil and Gas Accounting principles and procedures.

Paycom: May 2015 – December 2017

Senior Specialist II, Oklahoma City, Oklahoma

- Managed Payroll and Accounting for 150+ clients.
- Consulted clients to assure compliance with State and Federal regulations.

- Analyzed workpapers to ensure accuracy and compliance for clients.
 - Conducted team meetings to strategize plans to meet goals set by the company and clients.
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Education

University of Central Oklahoma, Edmond, Oklahoma

- Accounting/Business Management, Estimated completion December 2024.

Oklahoma Christian University, Oklahoma City, Oklahoma

- Biology/Business Management, August 2011 – May 2012

Abilene Christian University, Abilene, Texas

- Biology, August 2010 – May 2011
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Professional Development

- 2019 - Advanced Interviewing Techniques for Audit Professional, State Auditor and Inspector Office.
- 2019 - The Basics - Practical Regulatory Training for the Electric Industries.
- 2023 – Benefit-Cost Analysis (BCA) for Distributed Energy Resources

Case No. PUD 2023-000038
Certificate of Electronic Service

CERTIFICATE OF ELECTRONIC SERVICE

I, the undersigned, do hereby certify that on the 31st day of August 2023, a true and correct copy of the above and foregoing was sent electronically to:

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