

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF:

**ELECTRONIC APPLICATION OF KENTUCKY POWER)
COMPANY FOR (1) A GENERAL ADJUSTMENT)
OF ITS RATES FOR ELECTRIC SERVICE;)
(2) APPROVAL OF TARIFFS AND RIDERS;)
(3) APPROVAL OF ACCOUNTING PRACTICES)
TO ESTABLISH REGULATORY ASSETS AND)
LIABILITIES; (4) APPROVAL OF A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY;)
AND (5) ALL OTHER REQUIRED APPROVALS)
AND RELIEF)**

Case No. 2020-00174

**DIRECT TESTIMONY
AND EXHIBITS
OF
STEPHEN J. BARON**

ON BEHALF OF

THE KENTUCKY ATTORNEY GENERAL

AND

THE KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

**J. KENNEDY AND ASSOCIATES, INC.
ROSWELL, GEORGIA**

October 2020

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF:

**ELECTRONIC APPLICATION OF KENTUCKY POWER)
COMPANY FOR (1) A GENERAL ADJUSTMENT)
OF ITS RATES FOR ELECTRIC SERVICE;)
(2) APPROVAL OF TARIFFS AND RIDERS;)
(3) APPROVAL OF ACCOUNTING PRACTICES)
TO ESTABLISH REGULATORY ASSETS AND)
LIABILITIES; (4) APPROVAL OF A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY;)
AND (5) ALL OTHER REQUIRED APPROVALS)
AND RELIEF)**

Case No. 2020-00174

TABLE OF CONTENTS

I. INTRODUCTION AND SUMMARY 1

II. CLASS COST OF SERVICE AND REVENUE APPORTIONMENT 5

III. TRANSMISSION ISSUES 12

IV. NET METERING ISSUES..... 21

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF:

**ELECTRONIC APPLICATION OF KENTUCKY POWER)
COMPANY FOR (1) A GENERAL ADJUSTMENT)
OF ITS RATES FOR ELECTRIC SERVICE;)
(2) APPROVAL OF TARIFFS AND RIDERS;)
(3) APPROVAL OF ACCOUNTING PRACTICES)
TO ESTABLISH REGULATORY ASSETS AND)
LIABILITIES; (4) APPROVAL OF A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY;)
AND (5) ALL OTHER REQUIRED APPROVALS)
AND RELIEF)**

Case No. 2020-00174

DIRECT TESTIMONY OF STEPHEN J. BARON

I. INTRODUCTION AND SUMMARY

1

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

3 A. My name is Stephen J. Baron. My business address is J. Kennedy and Associates,
4 Inc. ("Kennedy and Associates"), 570 Colonial Park Drive, Suite 305, Roswell,
5 Georgia 30075.

6

7 **Q. What is your occupation and by whom are you employed?**

8 A. I am the President and a Principal of Kennedy and Associates, a firm of utility rate,
9 planning, and economic consultants in Atlanta, Georgia.

10

1 **Q. Please describe briefly the nature of the consulting services provided by Kennedy**
2 **and Associates.**

3 A. Kennedy and Associates provides consulting services in the electric and gas utility
4 industries. Our clients include state agencies and industrial electricity consumers. The
5 firm provides expertise in system planning, load forecasting, financial analysis, cost-
6 of-service, and rate design. Current clients include the Georgia and Louisiana Public
7 Service Commissions, and industrial consumer groups throughout the United States.

8

9 **Q. Please state your educational background and experience.**

10 A. I graduated from the University of Florida in 1972 with a B.A. degree with high
11 honors in Political Science and significant coursework in Mathematics and Computer
12 Science. In 1974, I received a Master of Arts Degree in Economics, also from the
13 University of Florida.

14

15 I have more than forty years of experience in the electric utility industry in the areas
16 of cost and rate analysis, forecasting, planning, and economic analysis.

17

18 I have presented testimony as an expert witness in Arizona, Arkansas, Colorado,
19 Connecticut, Florida, Georgia, Indiana, Kentucky, Louisiana, Maine, Maryland,
20 Michigan, Minnesota, Missouri, Montana, New Jersey, New Mexico, New York,
21 North Carolina, Ohio, Pennsylvania, Tennessee, Texas, Utah, Virginia, West Virginia,

1 Wisconsin, Wyoming, before the Federal Energy Regulatory Commission ("FERC"),
2 and in the United States Bankruptcy Court. A list of my specific regulatory
3 appearances can be found in Exhibit____(SJB-1).
4

5 **Q. Have you previously presented testimony before the Kentucky Public Service**
6 **Commission?**

7 A. Yes. I have testified before the Kentucky Public Service Commission
8 ("Commission") in 29 cases over the past thirty-five years, including numerous
9 Kentucky Power Company ("KPCo") cases. I have also testified in numerous
10 American Electric Power ("AEP") cases in other jurisdictions, including Ohio, West
11 Virginia, Virginia, Indiana, Louisiana, Tennessee, and before the FERC.
12

13 **Q. On whose behalf are you testifying in this proceeding?**

14 A. I am testifying on behalf of the Office of the Attorney General of the Commonwealth
15 of Kentucky ("AG") and the Kentucky Industrial Utility Customers, Inc. ("KIUC").
16

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

18 A. I address five general issues in my testimony. First, I respond to the Company's
19 proposed class cost of service study and the apportionment of the overall revenue
20 increase to rate classes. The Company filed a 12 CP class cost of service study in this
21 case, as it has done in prior cases. I do not object to the Company's study, as-filed.

1 With regard to KPCo's proposed apportionment of the revenue increase to rate
2 classes, the Company is proposing to increase rates to each class by maintaining the
3 current level of inter-class rate subsidies. Though, as a general matter, I have, and
4 continue to recommend that such inter-class rate subsidies be reduced and ultimately
5 eliminated over time, the AG-KIUC does not oppose the Company's proposal in this
6 case.

7
8 The next issue that I will also address concerns the Company's PJM transmission
9 expenses, primarily associated with Network Integrated Transmission Services
10 ("NITS"). As I will discuss, transmission investment in Kentucky has increased at a
11 much lower rate than investment by other AEP East Companies. However, because
12 NITS charges are based on the average cost for all of the AEP East Zone, KPCo's
13 transmission expenses have been increasing substantially, compared to investment in
14 Kentucky. These PJM charges are associated with AEP Operating Company and
15 State Transco transmission investments and approved by the FERC, not the Kentucky
16 Commission. Notwithstanding this jurisdiction issue, given the significant cost
17 disparities under the current arrangement, it is appropriate that the Commission
18 conduct an investigation to determine if the current arrangements in which KPCo is
19 allocated transmission costs are reasonable and in the public interest. I will address
20 this issue and explain why such an investigation should be initiated to protect
21 Kentucky customers.

1 Finally, I will address some issues associated with the Company's proposed Net
2 Metering tariff. My testimony primarily focuses on a review of the Company's
3 proposed rate to compensate rooftop solar customers for any excess energy that is
4 exported to the grid.

5
6 **Q. Would you please summarize your testimony?**

7 **A.** Yes.

- 8
- 9 ■ The Commission should adopt the Company's proposed allocation of the revenue
10 increase in this case, even though it does not reduce current inter-class rate
11 subsidies. This case presents a unique situation in which the economy of
12 Kentucky has been substantially, and detrimentally impacted by the pandemic.
13 While I have, and continue, to support the ultimate elimination of such subsidies
14 by moving rates towards cost of service, it is reasonable to delay such movement
15 at this time, given the economic environment. The AG-KIUC also support a
16 uniform reduction to the Company's proposed rate class increases in the likely
17 event that the Commission approves a lower revenue increase than requested by
18 the Company.
 - 19 ■ KPCo's PJM transmission expenses related to NITS charges reflect a level of
20 transmission investment substantially above the level associated with investment
21 in Kentucky. Pursuant to FERC approved tariffs and agreements, KPCo's charges
22 are based on the average cost of transmission investment in the AEP East zone.
23 While recognizing that this is a FERC tariff issue, it is still important for the
24 Commission to investigate this issue to determine if the current arrangements are
25 in the public interest. The Commission should initiate an investigation of KPCo's
26 PJM transmission charges, including whether the Company should continue in the
27 current AEP East Transmission Agreement.
 - 28
 - 29 ■ The Company's proposed Net Metering Service tariff ("NMS II") substantially
30 revises the payments that would be made to solar rooftop customers for their
31 excess solar generation that is exported to the grid. The Company is proposing an
32 avoided cost-based rate for such exported excess generation, above the needs of
33 the customer to serve the customer's own usage. The AG-KIUC supports the
34 Company's approach and recommends that it be adopted by the Commission.
35

1 **II. CLASS COST OF SERVICE AND REVENUE APPORTIONMENT**

2
3 **Q. Have you reviewed the class cost of service study presented by KPCo witness**
4 **Jason Stegall?**

5 A. Yes. The Company has developed a class cost of service study for the test year ending
6 March 31, 2020 using a traditional 12 coincident peak methodology (“12 CP”) to
7 allocate production and transmission costs to rate classes. The Company’s 12 CP
8 study follows the methodology that KPCo has used for many years. My review of the
9 filed study indicates that it is a reasonable basis on which to assign system costs to
10 rate classes. While I believe that alternative methodologies for production cost
11 allocation that focus more extensively on the summer system peak, which drives the
12 need for capacity on the KPCo system, can be considered the 12 CP study filed by the
13 Company is appropriate in this case to assess the reasonableness of class rates, relative
14 to the cost of providing service.

15
16 **Q. What is the value of a class cost of service study in a base rate case?**

17 A. A class cost of service study is one of the primary bases to determine how the
18 Company’s overall revenue requirement should be assigned to each rate class. Other
19 important considerations include ensuring that rates for energy intensive large
20 industrial customers who compete nationally and internationally are competitive.
21 Electric rates vary widely state by state for numerous reasons, including the

1 deregulation of generation supply in most states throughout PJM. Competitive
2 electric rates are especially important in Kentucky because the large manufacturing
3 base drives economic development, family supportive jobs, tax revenue and
4 prosperity.

5
6 A properly developed cost of service study first separates all of the Company's
7 investments, expenses and revenues into functional categories, representing the key
8 functions provided by the utility, for which it incurs costs. These functions are:
9 production, which includes owned generating units and purchased power contracts;
10 transmission, including PJM expenses incurred by Kentucky Power as part of its
11 membership in the PJM Regional Transmission Organization ("RTO"); distribution,
12 which includes lower voltage substations, primary voltage lines, secondary voltage
13 lines, transformers and meters and customer related costs associated with billing,
14 customer accounting and customer service. Each of these functional cost categories
15 is then allocated to each of the Company's rate classes based on a reasonable measure
16 of cost causation, such as each class's demand at the hour of the monthly system peak
17 (known as 12 coincident peak), kWh energy usage, and the number of customers in
18 the rate class.

19
20 Once these costs have been fully allocated, they can be compared to the revenues
21 collected from customers in the rate class. If the costs exceed the revenues for a

1 particular rate class, then that class is said to be “subsidized” by customers in other
2 rate classes. Likewise, if the revenues collected from customers in the rate class
3 exceed its allocated costs, then that rate class is paying subsidies to customers on other
4 rate class. In a base rate case, such as the current KPCo case, there is an opportunity
5 to realign rates to reduce or eliminate such subsidies.
6

7 **Q. Are the results of a class cost of service study the only factor that the Commission**
8 **should consider in setting rates for a particular rate class?**

9 A. No. While it is an important factor, it is not the only factor. First, there can be
10 legitimate disagreements on the appropriate methodology that should be used to
11 allocate costs to rate classes. Moreover, such factors as gradualism, economic impact
12 and hardship, rate shock, the impact on competitiveness of industry and other policy
13 considerations should also be considered by the Commission.
14

15 In particular, the Company is proposing a substantial increase during a period of
16 unprecedented economic disruption in Kentucky and throughout the country. AG-
17 KIUC witness Lane Kollen addresses the Company’s overall requested revenue
18 increase; however, notwithstanding the AG-KIUC adjustments to the Company’s
19 request, the likely increase in this case will still be significant. As such, as I will
20 discuss subsequently, this case presents a situation wherein subsidy reductions that

would otherwise be entirely appropriate can be temporarily suspended. KPCo is actually proposing this approach in this case, as discussed by Mr. Vaughan.

Q. What does the Company’s 12 CP cost of service study show?

A. The Company’s cost of service study clearly show that there is a significant amount of cross-subsidization between rate classes, primarily between the general service/commercial/industrial classes and the residential class. Table 1 below summarizes the current rate of return at present rates, the relative rate of return and the dollar subsidies paid or received by each rate class at present rates.

<u>Class</u>	<u>Rate of Return %</u>	<u>Relative ROR Index</u>	<u>Current Subsidy*</u>
RS	-0.11	-0.04	31,803,815
GS	7.25	2.53	(11,162,192)
LGS	6.38	2.23	(7,185,639)
IGS	5.62	1.97	(9,447,749)
MW	9.51	3.33	(35,229)
OL	15.21	5.32	(3,396,449)
SL	17.35	6.07	(576,557)
Total	2.86	1.00	0

* Positive value indicates that a subsidy is being received; negative value indicates subsidy is being paid.

1 As can be seen, all of the non-residential rate classes are paying subsidies to the
2 residential class. Rate IGS, which serves large manufacturing customers, is paying
3 \$9.4 million in subsidies. This means that these customers are paying over \$9.4
4 million a year more in electric power rates than KPCo's cost to actually provide the
5 power.

6
7 **Q. Did the Commission approved Order in the last KPCo rate case eliminate the**
8 **subsidies paid by Rate IGS?**

9 A. Yes. The Commission adopted the Settlement increases to each rate class, scaled back
10 roughly proportionately to reflect the additional revenue adjustment that the
11 Commission ordered over and above the Settlement amount. The Settlement was
12 designed to fully eliminate the subsidies paid by Rate IGS, using any Commission
13 authorized adjustments to the Company's filed revenue increase request. Since the
14 Settlement resulted in a revenue adjustment greater than the amount of the Rate IGS
15 subsidies remaining under the Company's filing, the Commission's approval of the
16 Settlement and the additional scale-back ordered by the Commission fully reduced the
17 test year subsidies paid by Rate IGS customers. Notwithstanding this, as shown in
18 Table 1, Rate IGS is once again paying substantial subsidies.

19
20 **Q. How is the Company proposing to address these subsidies in its recommended**
21 **allocation of its proposed base rate decrease to rate classes?**

1 A. As explained by Mr. Vaughan, KPCo is proposing to maintain these current inter-
2 class subsidies in its proposed rates. In other words, the Company has calculated its
3 proposed rates by 1) first determining the revenue increases for each rate class that is
4 needed to produce an equal rate of return (the Company's proposed rate of return of
5 6.54%) and then 2) increasing or decreasing these cost based revenue increases using
6 the current level of subsidies shown in Table 1. For example, the current residential
7 class subsidy is \$31.8 million. This is also the residential class subsidy at proposed
8 rates. Similarly, the current IGS subsidy is \$9.4 million and that is maintained at
9 proposed rates.

10

11 **Q. Is the Company's proposal to maintain current subsidies in its proposed rates**
12 **reasonable in this case?**

13 A. Yes. KIUC has taken position in all recent cases that subsidies should be reduced
14 and ultimately eliminated. In last case, as I discussed, the Commission approved a
15 settlement that eliminated IGS subsidies, which KIUC continues to believe is the
16 appropriate long-term policy that the Commission should follow. However, this
17 case occurs during an unprecedented pandemic and economic disruption that the
18 U.S. and Kentucky have not experienced since the 1930's. Given the unique, and
19 unprecedented economic environment in Kentucky, and the fact that any base rate
20 increase may be suspended, the AG-KIUC propose that the Commission adopt the

1 Company's proposed revenue allocation, which maintains current subsidies at
2 proposed rates.

3
4 **Q. Company witness Vaughan states in his testimony that the Company "would**
5 **be in favor of removing as much of the existing inter-class subsidy as**
6 **reasonable" in the event that the Commission approves a lower revenue**
7 **increase than requested by the Company. Should this approach be used in this**
8 **case?**

9 A. Ordinarily, this would be a reasonable approach to accomplish the objective of
10 moving rates towards cost of service and ultimately eliminate all inter-class
11 subsidies. However, as I discussed above, this is not an ordinary case. For the
12 same reasons that I discussed above with regard to supporting the Company's
13 proposal to maintain current subsidies at proposed rates, the AG-KIUC propose that
14 in the likely event that the final Commission approved overall revenue increase is
15 less than the Company's requested \$70.1 million increase, the reduction should be
16 applied on a uniform percentage basis to the Company's proposed revenue
17 increases. For example, if the Commission awards the Company 60% of its
18 requested increase, then the Company's proposed increase to all rate schedules
19 should be reduced by 40%.

III. TRANSMISSION ISSUES

Q. Would you explain the purpose of this section of your testimony?

A. KPCo currently participates in PJM pursuant to the AEP East Transmission Agreement (“Transmission Agreement”) among the AEP East Operating Companies, which include KPCo, Appalachian Power Company, Wheeling Power Company, Kingsport Power Company, Ohio Power Company and Indiana Michigan Power Company. As agent for these Operating Companies, AEP receives a bill from PJM for the combined transmission charges incurred by all of the Operating Company Load Serving Entities (“LSEs”) under the AEP OATT. These charges are allocated to AEP on the basis of the AEP East Companies’ contribution to the combined 1 CP demand of the Operating Companies. They are then reallocated to each Operating Company on a 12 CP basis pursuant to the Transmission Agreement.

This section of my testimony addresses the significant growth in the charges paid by KPCo for Network Integrated Transmission Service (“NITS”) charges compared to the corresponding revenue requirements of KPCo’s individual transmission investment. KPCo’s transmission investment and revenue requirement as a Transmission Owner (“TO”), together with the transmission revenue requirements of all of the other AEP East Operating Companies and the AEP State Transmission Companies (“State Transcos”) are combined to form an AEP Zone NITS revenue

1 requirement. KPCo pays a 12 CP share of the AEP East Operating Company share
2 of this total NITS revenue requirement. As I will discuss, KPCo pays a substantially
3 greater share of the combined NITS revenue requirement than it would under a KPCo
4 standalone transmission revenue requirement.

5
6 **Q. Is the AG-KIUC requesting that the Commission consider any specific revenue**
7 **requirement adjustment in this case, based on the disparity that you will be**
8 **discussing?**

9 A. Not directly. However, as discussed by AG-KIUC witness Lane Kollen, there are two
10 specific indirect revenue requirement adjustments that should be made, in light of the
11 added cost burden on KPCo's customers due to this standalone vs. allocated NITS
12 revenue requirement detrimental disparity. More significantly, in the long term is the
13 question of whether it is in the public interest for KPCo to continue participating in
14 the AEP East Transmission Agreement itself and whether KPCo should seek to
15 become an individual member of PJM, rather than participate as part of the AEP East
16 Company group. I will discuss this important issue and propose that the Commission
17 initiate a comprehensive investigation to determine the reasonableness of the current
18 arrangement. As shown in Table 2 below, the Company's PJM transmission expenses
19 are a significant expenditure to the Company. PJM NITS charges comprise over 90%
20 of these PJM transmission expenses.

1

Table 2	
Total costs charged to KPCo for the most recent 12 month period available	
Account	Total
4561002 RTO Formation Cost Recovery	\$ 112,115
4561005 PJM Point to Point Trans Svc	\$ (1,075,140)
4561035 PJM Affiliated Trans NITS Cost	\$ 40,768,053
4561036 PJM Affiliated Trans TO Cost	\$ 166,952
4561060 Aff PJM Trans Enhancement Cost	\$ 931,594
5650012 PJM Trans Enhancement Charge	\$ 1,245,983
5650015 PJM TO Serv Exp - Aff/ inc. Transco	\$ 199,951
5650016 PJM NITS Expense - Affiliated/ inc. Transco	\$ 41,062,857
5650019 Aff PJM Trans Enhancement Exps	\$ 5,585,557
5650021 PJM NITS Expense - Non-Affiliated	\$ 307,683
Grand Total	\$ 89,305,604
NITS Charges (Affiliate, Non-Affiliate)	\$ 81,830,909
Source: KPCO_R_KIUC_AG_1_45_Attachment_1	

2

3

4 **Q. Are these PJM transmission expenses growing rapidly?**

5 A. Yes. Mr. Vaughan confirms this in his testimony at page 33. He states as follows:

6 Q. WHAT IS THE PROPOSED LEVEL OF PJM LSE OATT
7 CHARGES AND CREDITS TO BE INCLUDED IN BASE RATES?

8

9 A. The adjusted test year Kentucky retail jurisdictional total of net PJM
10 LSE OATT charges and credits included in base rates is \$96,896,495. This
11 amount has grown from \$74,377,364 in Case No. 2017-00179, and from
12 \$53,779,456 in Case No. 2014-00396. This single expense is now 16% of
13 the Company's total proposed revenues. (emphasis added).

14

1 **Q. Is KPCo’s share of the AEP East PJM NITS transmission charges consistent**
2 **with the Company’s transmission investment?**

3 A. No. As I will show, KPCo is being allocated a substantially greater share of the AEP
4 East pooled PJM NITS charges than it would pay if it were a standalone Company.
5 As I discussed earlier, the total AEP transmission zone NITS charges are comprised
6 of the revenue requirements associated with transmission investment of the AEP East
7 Operating Companies plus each State Transco. About 85% of these Operating
8 Company and State Transco revenue requirements are allocated to the AEP LSE and
9 15% are allocated to other non-AEP network service customers (primarily municipal
10 utilities) in the AEP PJM Zone. KPCo, and each of the other Operating Companies
11 are then allocated a share of the AEP LSE costs on a 12 CP basis. KPCo’s 12 CP
12 share of these costs are currently about 5.6% of the total AEP LSE amount.

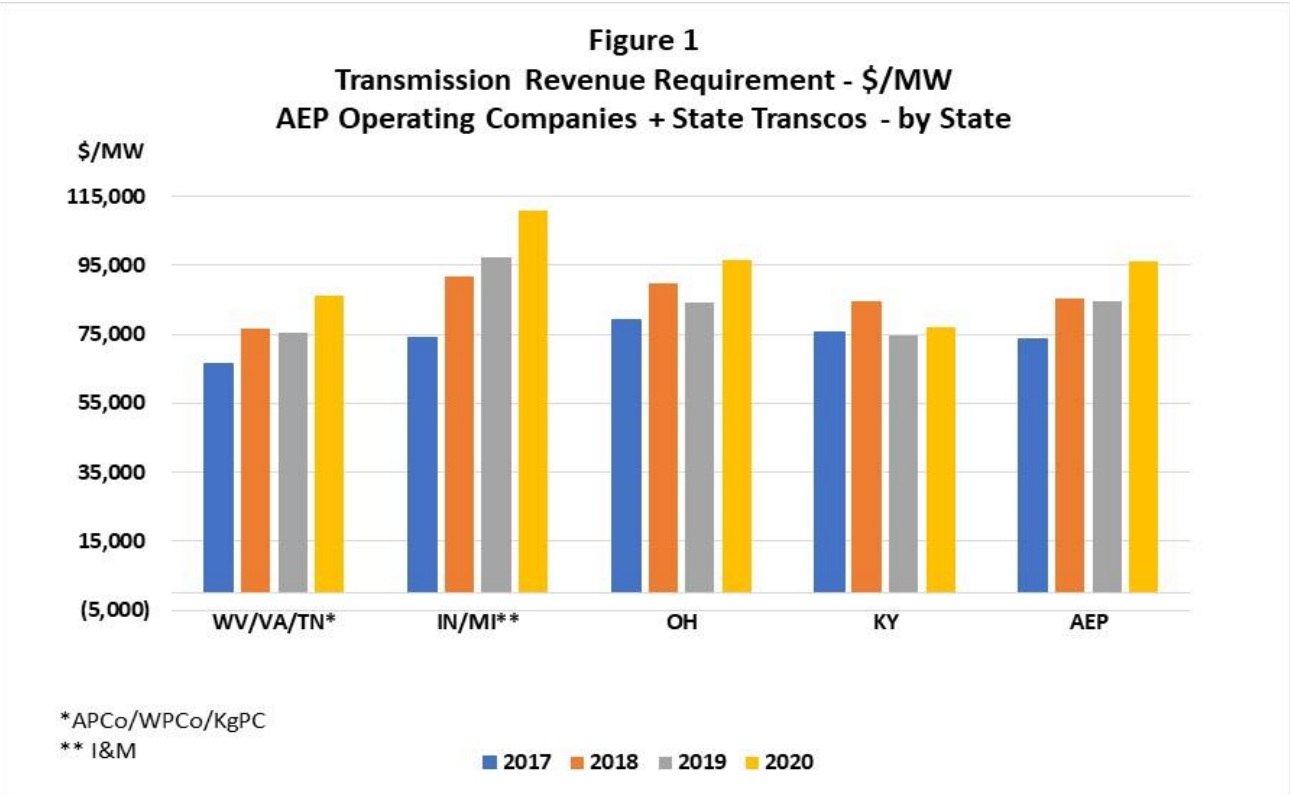
13
14 **Q. Have you developed any analyses that provides a comparison of KPCo’s PJM**
15 **transmission expenses under the Transmission Agreement to the Company’s**
16 **standalone transmission investment revenue requirement?**

17 A. Yes. Figure 1 provides a graphic comparison for the years 2017 through 2020 for
18 KPCo and each of the other Companies.¹ The data for “AEP” represents the average
19 NITS cost per MW of the AEP LSE as a whole. In order to present a fair comparison,
20 I have normalized the total revenue requirements charged to each Company by its 12

¹ For graphic clarity, the APCo, WPCo and Kingsport Power costs are grouped together.

1 CP MW, which is the allocation basis for these costs. The cost/MW shown in Figure
2 1 represents the total Affiliate NITS and State Transco NITS revenue requirements
3 assigned to each Company, divided by its respective 12 CP MW. The AEP values
4 represent the average NITS costs per MW of the AEP LSE before allocation pursuant
5 to the Transmission Agreement.² As can be seen from the chart, KPCo's average
6 transmission revenue requirement per MW based on its own costs plus the costs of
7 the Kentucky Transmission Company are substantially lower than the costs that KPCo
8 is charged under the Transmission Agreement allocation.

9



10

² Revenue requirements also include the RTEP related costs assigned to each Company and the AEP LSE.

1 In 2020, the difference in total revenue requirements between KPCo's actual costs
2 (including the Kentucky Transco revenue requirements) and the amount allocated to
3 KPCo under the Transmission Agreement is about \$19 million. This is 25% above
4 the KPCo standalone transmission costs. Since 100% of the AEP LSE costs are
5 allocated to the Operating Companies, this means that other Operating Companies are
6 being allocated much lower costs under the Transmission Agreement than would be
7 the case if they were charged their standalone revenue requirements.

8
9 Based upon AEP's earnings presentations, significant growth in transmission rate base
10 is expected to continue. AEP's 2020-2024 capital budget forecast for new
11 transmission spending in PJM is \$9.772 Billion.³ Approximately 5.6% of the AEP
12 LSE's 85% share of these expenditures, or \$465 million, will be allocated to Kentucky
13 Power. Therefore, the current \$19 million annual premium charged to Kentucky
14 under the Transmission Agreement is likely to increase.

15
16 **Q. Why is there such a large disparity in the KPCo's standalone transmission**
17 **revenue requirements versus the amount allocated under the Transmission**
18 **Agreement?**

19 A. Based on Figure 1, there has been significant growth in transmission investment made
20 by each of the Companies and State Transcos, except KPCo and the Kentucky

³ AEP September 17, 2020 UBS Roadshow at 24.

1 Transco. In addition, Indiana and Michigan has experienced significant growth in
2 transmission revenue requirements over the past 4 years, while the I&M 12 CP
3 demand has actually declined. This causes the 12 CP share of the other Operating
4 Companies to increase at the same time that I&M is substantially adding transmission
5 plant. Table 3 shows the annual growth rates for each Company in both 12 CP demand
6 and transmission revenue requirements over the period 2017 to 2020. As can be seen,
7 I&M has had an annualized decline in its 12 CP share of AEP LSE costs, while its
8 transmission revenue requirements have been growing by 14% per year. In
9 comparison, KPCo has had a relatively flat change in its 12 CP demand and has
10 increased its transmission revenue requirements by a much lower 0.54% per year.
11 Because the total AEP LSE costs are allocated on a 12 CP basis, this has resulted in
12 KPCo receiving a disparate share of NITS costs relative to its standalone transmission
13 revenue requirements.

Table 3
Annual Growth in Transmission Revenue Requirements and 12 CP Demand - 2017 to 2020

	WV/VA/TN	IN/MI	OH	KY	AEP LSE
12 CP	0.84%	-0.33%	1.37%	0.04%	0.82%
14 Transmission Rev. Req.	9.87%	13.88%	8.30%	0.54%	10.17%

15
16 **Q. Is there anything that KPCo can do immediately about this continuing disparity**
17 **between its own transmission costs and the transmission charges that it is being**
18 **allocated in the Transmission Agreement?**

1 A. Since the allocation of these transmission costs is governed by a FERC tariff, it would
2 likely require approval by the FERC of any changes.

3

4 **Q. Can KPCo withdraw from the AEP East Transmission Agreement?**

5 A. Yes. KPCo has the right to withdraw from the AEP East Transmission Agreement
6 upon 3 years notice. In that event, it is my understanding that KPCo would become a
7 standalone PJM member. However, according to the Company's response to AG-
8 KIUC 1-52 [attached as Exhibit__(SJB-2)], in that event, KPCo would be allocated
9 these NITS charges based on its 1 CP demand coincident with the AEP zone, rather
10 than the 12 CP demand used to allocate these costs under the Transmission
11 Agreement. As discussed in the data response, the PJM Consolidated Transmission
12 Owner's Agreement ("CTOA"). Section 7.4 of the CTOA states as follows:

13 For purposes of developing rates for service under the PJM Tariff,
14 transmission rate Zones smaller than those shown in Attachment J to the PJM
15 Tariff, or subzones of those Zones, shall not be permitted within the current
16 boundaries of the PJM Region; provided, however, that additional Zones may
17 be established if the current boundaries of the PJM Region is expanded to
18 accommodate new Parties to this Agreement.

19

20 While this is a legal issue, based on the Company's interpretation, as stated in the data
21 response, KPCo would continue to pay NITS charges based on the entire AEP East
22 zone costs, not its standalone costs. However, PJM tariffs and agreements can be
23 modified if the FERC determines that the current provisions are not just and
24 reasonable.

25

1 **Q. Given the disparities that you have identified, should the Kentucky Commission**
2 **initiate an investigation to better understand all of the implication of this issue**
3 **and determine if there are changes that the Company can undertake to**
4 **potentially lower its costs?**

5 A. Yes. Based on the response to AG-KIUC 1-43 [attached as Exhibit__(SJB-3)], the
6 Company on its own has not conducted any economic analyses to determine if it
7 should continue participating in the Transmission Agreement. Moreover, even if the
8 current PJM CTOA requires KPCo to continue paying a share of the AEP zone costs,
9 rather than its own standalone costs in the event that the Company terminated
10 participation in the Transmission Agreement, it is possible for the Company or the
11 Commission to seek changes at the FERC that could result in cost savings. These
12 issues should be explored in a Commission investigation so that the Commission is
13 fully informed about this issue. As such, the AG and KIUC recommend that the
14 Commission initiate an investigation following completion of this rate case. The
15 Company should be required to present economic analyses and testimony that
16 demonstrate that continued participation in the Transmission Agreement is in the
17 public interest.

18
19 In Kentucky Power’s last rate case the Commission recognized that this type of
20 investigation may be necessary. “Further, the Commission recognizes that Kentucky
21 Power’s interests may not be aligned with the interests of other AEP operating

1 companies. The Commission is aware that PJM bills AEP based on a one-coincident
2 peak methodology, and that AEP subsequently allocates those costs to its operating
3 companies using a twelve-coincident peak methodology. The Commission finds that
4 Kentucky Power should file an annual report with the supporting calculations used by
5 AEP to allocate these costs.”⁴

6
7 **IV. NET METERING ISSUES**

8
9 **Q. Have you reviewed the Company’s proposed NMS II net metering tariff?**

10 A. Yes. While I have generally reviewed the proposed tariff, my primary focus has been
11 on the Company’s proposed excess energy purchase rate that is discussed on page 1
12 of NMS II. As explained by Company witness Vaughan, the Company is proposing
13 to close its current Net Metering Service (“NMS”) tariff to new customers on January
14 1, 2021 and replace it with a net NMS II tariff that Mr. Vaughan states is consistent
15 with Kentucky SB 100 (“the Net Metering Act”).

16
17 **Q. Does the AG-KIUC have a position on the Company’s proposal?**

18 A. Yes. The AG-KIUC generally agree with KPCo’s proposal to modify the rate that net
19 metering customers are paid for their excess energy that is exported to the grid. The
20 current price paid for such exported energy is not consistent with the value of this

⁴ Case No. 2017-00179, January 18, 2018 Order at 74.

1 energy or avoided cost and therefore represents a subsidy that is paid by non-
2 participating KPCo customers to solar customers.

3
4 **Q. Would you explain why you believe that the current payment rate for exported,**
5 **excess rooftop solar energy produces a subsidy in the form of a transfer from**
6 **non-participating customers to solar customers?**

7 A. The current payment rate for excess energy based on the standard residential tariff rate
8 reflects the embedded cost of providing full service to residential customers. This
9 includes the full fixed costs of generation, transmission, distribution, and general
10 plant, such as KPCo office buildings. Exported solar energy clearly does not avoid
11 all such costs, but that is what is assumed in the current payment rate to solar
12 customers for their excess energy. Even under the Company's proposed tariff, solar
13 customers are able to use their solar generation to fully offset the customer's own
14 usage, which means that the solar customer is being paid, implicitly, at the full
15 residential tariff rate for this portion of their solar generation. The proposed tariff,
16 NMSII, only changes the payment rate for the excess portion of the customer's solar
17 generation. It is very likely that substantial subsidies would still continue even if the
18 Company's proposal in this case is adopted.

19
20 **Q. What would a non-subsidized rooftop solar rate look like?**

1 A. Ideally, a solar customer should have a 100% buy/sell rate. Under such an
2 arrangement, the customer would pay the full residential tariff rate for 100% of the
3 customer's energy usage and receive KPCo's avoided cost for 100% of the customer's
4 solar generation. As I discussed above, even under the Company's revised net
5 metering tariff, the customer will implicitly continue to receive the residential tariff
6 rate as payment for solar generation that is available to offset the customer's own
7 household usage each month (i.e., the portion of a customer's total solar generation
8 that is netted against a customer's usage).

9

10 **Q. Have you reviewed the Company's methodology that it used to calculate the**
11 **\$0.03659 excess energy payment rate?**

12 A. Yes. As shown on Mr. Vaughan's Exhibit AEV-3 and in the excel workbook that
13 produced this exhibit, provided in response to KPCO_KPSC_3_Attachment 17, the
14 \$.03659 excess energy payment rate includes estimates of both avoided energy cost
15 and avoided capacity cost that are based on an analysis of an estimate of net excess
16 solar energy by hour. Mr. Vaughan bases his avoided energy cost value on a weighted
17 on-peak/off-peak calculation of PJM locational marginal prices, as used in the
18 Company's Cogen SPP rate calculation. The on-peak weighting, reflecting an
19 estimate of solar output, is 71% and the off-peak weighting is 29%. To calculate
20 avoided generation and transmission cost, Mr. Vaughan has estimated the coincidence

1 of solar excess energy with a probability weighted 5 CP demand (generation) and 12
2 CP demand (transmission).

3
4 **Q. Do you believe that Mr. Vaughan's proposed excess energy payment rate is**
5 **reasonable?**

6 A. Yes, it is a reasonable estimate of the value of netted excess rooftop solar energy.
7 While there certainly could be more detailed and comprehensive methodologies used
8 to develop an excess energy avoided cost rate, I believe that the Company's
9 calculation is reasonable and provides solar customers a fair compensation for their
10 excess energy. The proposed rate represents a more reasonable payment for excess
11 energy than the current rate, which pays customers at the same tariff rate at which they
12 purchase energy from the Company.

13
14 **Q. Does that complete your testimony?**

15 A. Yes.

16

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF:

**ELECTRONIC APPLICATION OF KENTUCKY POWER)
COMPANY FOR (1) A GENERAL ADJUSTMENT)
OF ITS RATES FOR ELECTRIC SERVICE;)
(2) APPROVAL OF TARIFFS AND RIDERS;)
(3) APPROVAL OF ACCOUNTING PRACTICES)
TO ESTABLISH REGULATORY ASSETS AND)
LIABILITIES; (4) APPROVAL OF A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY;)
AND (5) ALL OTHER REQUIRED APPROVALS)
AND RELIEF)**

Case No. 2020-00174

**EXHIBITS
OF
STEPHEN J. BARON**

ON BEHALF OF

THE KENTUCKY ATTORNEY GENERAL

AND

THE KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

**J. KENNEDY AND ASSOCIATES, INC.
ROSWELL, GEORGIA**

October 2020

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF:

**ELECTRONIC APPLICATION OF KENTUCKY POWER)
COMPANY FOR (1) A GENERAL ADJUSTMENT)
OF ITS RATES FOR ELECTRIC SERVICE;)
(2) APPROVAL OF TARIFFS AND RIDERS;)
(3) APPROVAL OF ACCOUNTING PRACTICES)
TO ESTABLISH REGULATORY ASSETS AND)
LIABILITIES; (4) APPROVAL OF A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY;)
AND (5) ALL OTHER REQUIRED APPROVALS)
AND RELIEF)**

Case No. 2020-00174

EXHIBIT__(SJB-1)

OF

STEPHEN J. BARON

ON BEHALF OF

THE KENTUCKY ATTORNEY GENERAL

AND

THE KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

**J. KENNEDY AND ASSOCIATES, INC.
ROSWELL, GEORGIA**

October 2020

Professional Qualifications

Of

Stephen J. Baron

Mr. Baron graduated from the University of Florida in 1972 with a B.A. degree with high honors in Political Science and significant coursework in Mathematics and Computer Science. In 1974, he received a Master of Arts Degree in Economics, also from the University of Florida. His areas of specialization were econometrics, statistics, and public utility economics. His thesis concerned the development of an econometric model to forecast electricity sales in the State of Florida, for which he received a grant from the Public Utility Research Center of the University of Florida. In addition, he has advanced study and coursework in time series analysis and dynamic model building.

Mr. Baron has more than forty years of experience in the electric utility industry in the areas of cost and rate analysis, forecasting, planning, and economic analysis.

Following the completion of my graduate work in economics, he joined the staff of the Florida Public Service Commission in August of 1974 as a Rate Economist. His responsibilities included the analysis of rate cases for electric, telephone, and gas utilities, as well as the preparation of cross-examination material and the preparation of staff recommendations.

In December 1975, he joined the Utility Rate Consulting Division of Ebasco Services, Inc.

J. KENNEDY AND ASSOCIATES, INC.

as an Associate Consultant. In the seven years he worked for Ebasco, he received successive promotions, ultimately to the position of Vice President of Energy Management Services of Ebasco Business Consulting Company. His responsibilities included the management of a staff of consultants engaged in providing services in the areas of econometric modeling, load and energy forecasting, production cost modeling, planning, cost-of-service analysis, cogeneration, and load management.

He joined the public accounting firm of Coopers & Lybrand in 1982 as a Manager of the Atlanta Office of the Utility Regulatory and Advisory Services Group. In this capacity he was responsible for the operation and management of the Atlanta office. His duties included the technical and administrative supervision of the staff, budgeting, recruiting, and marketing as well as project management on client engagements. At Coopers & Lybrand, he specialized in utility cost analysis, forecasting, load analysis, economic analysis, and planning.

In January 1984, he joined the consulting firm of Kennedy and Associates as a Vice President and Principal. Mr. Baron became President of the firm in January 1991.

He has presented numerous papers and published an article entitled "How to Rate Load Management Programs" in the March 1979 edition of "Electrical World." His article on "Standby Electric Rates" was published in the November 8, 1984 issue of "Public Utilities Fortnightly." In February of 1984, he completed a detailed analysis entitled "Load Data

Transfer Techniques" on behalf of the Electric Power Research Institute, which published the study.

Mr. Baron has presented testimony as an expert witness in Arizona, Arkansas, Colorado, Connecticut, Florida, Georgia, Indiana, Kentucky, Louisiana, Maine, Michigan, Minnesota, Maryland, Missouri, Montana, New Jersey, New Mexico, New York, North Carolina, Ohio, Pennsylvania, Tennessee, Texas, Utah, Virginia, West Virginia, Wisconsin, Wyoming, the Federal Energy Regulatory Commission and in United States Bankruptcy Court. A list of his specific regulatory appearances follows.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
4/81	203(B)	KY	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.	Cost-of-service.
4/81	ER-81-42	MO	Kansas City Power & Light Co.	Kansas City Power & Light Co.	Forecasting.
6/81	U-1933	AZ	Arizona Corporation Commission	Tucson Electric Co.	Forecasting planning.
2/84	8924	KY	Airco Carbide	Louisville Gas & Electric Co.	Revenue requirements, cost-of-service, forecasting, weather normalization.
3/84	84-038-U	AR	Arkansas Electric Energy Consumers	Arkansas Power & Light Co.	Excess capacity, cost-of-service, rate design.
5/84	830470-EI	FL	Florida Industrial Power Users' Group	Florida Power Corp.	Allocation of fixed costs, load and capacity balance, and reserve margin. Diversification of utility.
10/84	84-199-U	AR	Arkansas Electric Energy Consumers	Arkansas Power and Light Co.	Cost allocation and rate design.
11/84	R-842651	PA	Lehigh Valley Power Committee	Pennsylvania Power & Light Co.	Interruptible rates, excess capacity, and phase-in.
1/85	85-65	ME	Airco Industrial Gases	Central Maine Power Co.	Interruptible rate design.
2/85	I-840381	PA	Philadelphia Area Industrial Energy Users' Group	Philadelphia Electric Co.	Load and energy forecast.
3/85	9243	KY	Alcan Aluminum Corp., et al.	Louisville Gas & Electric Co.	Economics of completing fossil generating unit.
3/85	3498-U	GA	Attorney General	Georgia Power Co.	Load and energy forecasting, generation planning economics.
3/85	R-842632	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Generation planning economics, prudence of a pumped storage hydro unit.
5/85	84-249	AR	Arkansas Electric Energy Consumers	Arkansas Power & Light Co.	Cost-of-service, rate design return multipliers.
5/85		City of Santa Clara	Chamber of Commerce	Santa Clara Municipal	Cost-of-service, rate design.
6/85	84-768-E-42T	WV	West Virginia Industrial Intervenors	Monongahela Power Co.	Generation planning economics, prudence of a pumped storage hydro unit.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
6/85	E-7 Sub 391	NC	Carolina Industrials (CIGFUR III)	Duke Power Co.	Cost-of-service, rate design, interruptible rate design.
7/85	29046	NY	Industrial Energy Users Association	Orange and Rockland Utilities	Cost-of-service, rate design.
10/85	85-043-U	AR	Arkansas Gas Consumers	Arkla, Inc.	Regulatory policy, gas cost-of- service, rate design.
10/85	85-63	ME	Airco Industrial Gases	Central Maine Power Co.	Feasibility of interruptible rates, avoided cost.
2/85	ER- 8507698	NJ	Air Products and Chemicals	Jersey Central Power & Light Co.	Rate design.
3/85	R-850220	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Optimal reserve, prudence, off-system sales guarantee plan.
2/86	R-850220	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Optimal reserve margins, prudence, off-system sales guarantee plan.
3/86	85-299U	AR	Arkansas Electric Energy Consumers	Arkansas Power & Light Co.	Cost-of-service, rate design, revenue distribution.
3/86	85-726- EL-AIR	OH	Industrial Electric Consumers Group	Ohio Power Co.	Cost-of-service, rate design, interruptible rates.
5/86	86-081- E-GI	WV	West Virginia Energy Users Group	Monongahela Power Co.	Generation planning economics, prudence of a pumped storage hydro unit.
8/86	E-7 Sub 408	NC	Carolina Industrial Energy Consumers	Duke Power Co.	Cost-of-service, rate design, interruptible rates.
10/86	U-17378	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Excess capacity, economic analysis of purchased power.
12/86	38063	IN	Industrial Energy Consumers	Indiana & Michigan Power Co.	Interruptible rates.
3/87	EL-86- 53-001 EL-86- 57-001	Federal Energy Regulatory Commission (FERC)	Louisiana Public Service Commission Staff	Gulf States Utilities, Southern Co.	Cost/benefit analysis of unit power sales contract.
4/87	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Load forecasting and imprudence damages, River Bend Nuclear unit.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdiction	Party	Utility	Subject
5/87	87-023-E-C	WV	Airco Industrial Gases	Monongahela Power Co.	Interruptible rates.
5/87	87-072-E-G1	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Analyze Mon Power's fuel filing and examine the reasonableness of MP's claims.
5/87	86-524-E-SC	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Economic dispatching of pumped storage hydro unit.
5/87	9781	KY	Kentucky Industrial Energy Consumers	Louisville Gas & Electric Co.	Analysis of impact of 1986 Tax Reform Act.
6/87	3673-U	GA	Georgia Public Service Commission	Georgia Power Co.	Economic prudence, evaluation of Vogtle nuclear unit - load forecasting, planning.
6/87	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Phase-in plan for River Bend Nuclear unit.
7/87	85-10-22	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Methodology for refunding rate moderation fund.
8/87	3673-U	GA	Georgia Public Service Commission	Georgia Power Co.	Test year sales and revenue forecast.
9/87	R-850220	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Excess capacity, reliability of generating system.
10/87	R-870651	PA	Duquesne Industrial Intervenors	Duquesne Light Co.	Interruptible rate, cost-of-service, revenue allocation, rate design.
10/87	I-860025	PA	Pennsylvania Industrial Intervenors		Proposed rules for cogeneration, avoided cost, rate recovery.
10/87	E-015/GR-87-223	MN	Taconite Intervenors	Minnesota Power & Light Co.	Excess capacity, power and cost-of-service, rate design.
10/87	8702-EI	FL	Occidental Chemical Corp.	Florida Power Corp.	Revenue forecasting, weather normalization.
12/87	87-07-01	CT	Connecticut Industrial Energy Consumers	Connecticut Light Power Co.	Excess capacity, nuclear plant phase-in.
3/88	10064	KY	Kentucky Industrial Energy Consumers	Louisville Gas & Electric Co.	Revenue forecast, weather normalization rate treatment of cancelled plant.
3/88	87-183-TF	AR	Arkansas Electric Consumers	Arkansas Power & Light Co.	Standby/backup electric rates.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdiction	Party	Utility	Subject
5/88	870171C001	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Cogeneration deferral mechanism, modification of energy cost recovery (ECR).
6/88	870172C005	PA	GPU Industrial Intervenors	Pennsylvania Electric Co.	Cogeneration deferral mechanism, modification of energy cost recovery (ECR).
7/88	88-171- EL-AIR 88-170- EL-AIR Interim Rate Case	OH	Industrial Energy Consumers	Cleveland Electric/ Toledo Edison	Financial analysis/need for interim rate relief.
7/88	Appeal of PSC	19th Judicial Docket U-17282	Louisiana Public Service Commission Circuit Court of Louisiana	Gulf States Utilities	Load forecasting, imprudence damages.
11/88	R-880989	PA	United States Steel	Carnegie Gas	Gas cost-of-service, rate design.
11/88	88-171- EL-AIR 88-170- EL-AIR	OH	Industrial Energy Consumers	Cleveland Electric/ Toledo Edison. General Rate Case.	Weather normalization of peak loads, excess capacity, regulatory policy.
3/89	870216/283 284/286	PA	Armco Advanced Materials Corp., Allegheny Ludlum Corp.	West Penn Power Co.	Calculated avoided capacity, recovery of capacity payments.
8/89	8555	TX	Occidental Chemical Corp.	Houston Lighting & Power Co.	Cost-of-service, rate design.
8/89	3840-U	GA	Georgia Public Service Commission	Georgia Power Co.	Revenue forecasting, weather normalization.
9/89	2087	NM	Attorney General of New Mexico	Public Service Co. of New Mexico	Prudence - Palo Verde Nuclear Units 1, 2 and 3, load fore- casting.
10/89	2262	NM	New Mexico Industrial Energy Consumers	Public Service Co. of New Mexico	Fuel adjustment clause, off- system sales, cost-of-service, rate design, marginal cost.
11/89	38728	IN	Industrial Consumers for Fair Utility Rates	Indiana Michigan Power Co.	Excess capacity, capacity equalization, jurisdictional cost allocation, rate design, interruptible rates.
1/90	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Jurisdictional cost allocation, O&M expense analysis.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdiction	Party	Utility	Subject
5/90	890366	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Non-utility generator cost recovery.
6/90	R-901609	PA	Armco Advanced Materials Corp., Allegheny Ludlum Corp.	West Penn Power Co.	Allocation of QF demand charges in the fuel cost, cost-of- service, rate design.
9/90	8278	MD	Maryland Industrial Group	Baltimore Gas & Electric Co.	Cost-of-service, rate design, revenue allocation.
12/90	U-9346 Rebuttal	MI	Association of Businesses Advocating Tariff Equity	Consumers Power Co.	Demand-side management, environmental externalities.
12/90	U-17282 Phase IV	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, jurisdictional allocation.
12/90	90-205	ME	Airco Industrial Gases	Central Maine Power Co.	Investigation into interruptible service and rates.
1/91	90-12-03 Interim	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Interim rate relief, financial analysis, class revenue allocation.
5/91	90-12-03 Phase II	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Revenue requirements, cost-of- service, rate design, demand-side management.
8/91	E-7, SUB 487	NC	North Carolina Industrial Energy Consumers	Duke Power Co.	Revenue requirements, cost allocation, rate design, demand- side management.
8/91	8341 Phase I	MD	Westvaco Corp.	Potomac Edison Co.	Cost allocation, rate design, 1990 Clean Air Act Amendments.
8/91	91-372 EL-UNC	OH	Armco Steel Co., L.P.	Cincinnati Gas & Electric Co.	Economic analysis of cogeneration, avoid cost rate.
9/91	P-910511 P-910512	PA	Allegheny Ludlum Corp., Armco Advanced Materials Co., The West Penn Power Industrial Users' Group	West Penn Power Co.	Economic analysis of proposed CWIP Rider for 1990 Clean Air Act Amendments expenditures.
9/91	91-231 -E-NC	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Economic analysis of proposed CWIP Rider for 1990 Clean Air Act Amendments expenditures.
10/91	8341 - Phase II	MD	Westvaco Corp.	Potomac Edison Co.	Economic analysis of proposed CWIP Rider for 1990 Clean Air

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdiction	Party	Utility	Subject
					Act Amendments expenditures.
10/91	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Results of comprehensive management audit.
	Note: No testimony was prefiled on this.				
11/91	U-17949 Subdocket A	LA	Louisiana Public Service Commission Staff	South Central Bell Telephone Co. and proposed merger with Southern Bell Telephone Co.	Analysis of South Central Bell's restructuring and
12/91	91-410-EL-AIR	OH	Armco Steel Co., Air Products & Chemicals, Inc.	Cincinnati Gas & Electric Co.	Rate design, interruptible rates.
12/91	P-880286	PA	Armco Advanced Materials Corp., Allegheny Ludlum Corp.	West Penn Power Co.	Evaluation of appropriate avoided capacity costs - QF projects.
1/92	C-913424	PA	Duquesne Interruptible Complainants	Duquesne Light Co.	Industrial interruptible rate.
6/92	92-02-19	CT	Connecticut Industrial Energy Consumers	Yankee Gas Co.	Rate design.
8/92	2437	NM	New Mexico Industrial Intervenors	Public Service Co. of New Mexico	Cost-of-service.
8/92	R-00922314	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Cost-of-service, rate design, energy cost rate.
9/92	39314	ID	Industrial Consumers for Fair Utility Rates	Indiana Michigan Power Co.	Cost-of-service, rate design, energy cost rate, rate treatment.
10/92	M-00920312 C-007	PA	The GPU Industrial Intervenors	Pennsylvania Electric Co.	Cost-of-service, rate design, energy cost rate, rate treatment.
12/92	U-17949	LA	Louisiana Public Service Commission Staff	South Central Bell Co.	Management audit.
12/92	R-00922378	PA	Armco Advanced Materials Co. The WPP Industrial Intervenors	West Penn Power Co.	Cost-of-service, rate design, energy cost rate, SO ₂ allowance rate treatment.
1/93	8487	MD	The Maryland Industrial Group	Baltimore Gas & Electric Co.	Electric cost-of-service and rate design, gas rate design (flexible rates).
2/93	E002/GR-92-1185	MN	North Star Steel Co. Praxair, Inc.	Northern States Power Co.	Interruptible rates.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdic.	Party	Utility	Subject
4/93	EC92 21000 ER92-806- 000 (Rebuttal)	Federal Energy Regulatory Commission	Louisiana Public Service Commission Staff	Gulf States Utilities/Entergy agreement.	Merger of GSU into Entergy System; impact on system
7/93	93-0114- E-C	WV	Airco Gases	Monongahela Power Co.	Interruptible rates.
8/93	930759-EG	FL	Florida Industrial Power Users' Group	Generic - Electric Utilities	Cost recovery and allocation of DSM costs.
9/93	M-009 30406	PA	Lehigh Valley Power Committee	Pennsylvania Power & Light Co.	Ratemaking treatment of off-system sales revenues.
11/93	346	KY	Kentucky Industrial Utility Customers	Generic - Gas Utilities	Allocation of gas pipeline transition costs - FERC Order 636.
12/93	U-17735	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	Nuclear plant prudence, forecasting, excess capacity.
4/94	E-015/ GR-94-001	MN	Large Power Intervenors	Minnesota Power Co.	Cost allocation, rate design, rate phase-in plan.
5/94	U-20178	LA	Louisiana Public Service Commission	Louisiana Power & Light Co.	Analysis of least cost integrated resource plan and demand-side management program.
7/94	R-00942986	PA	Armco, Inc.; West Penn Power Industrial Intervenors	West Penn Power Co.	Cost-of-service, allocation of rate increase, rate design, emission allowance sales, and operations and maintenance expense.
7/94	94-0035- E-42T	WV	West Virginia Energy Users Group	Monongahela Power Co.	Cost-of-service, allocation of rate increase, and rate design.
8/94	EC94 13-000	Federal Energy Regulatory Commission	Louisiana Public Service Commission	Gulf States Utilities/Entergy	Analysis of extended reserve shutdown units and violation of system agreement by Entergy.
9/94	R-00943 081 R-00943 081C0001	PA	Lehigh Valley Power Committee	Pennsylvania Public Utility Commission	Analysis of interruptible rate terms and conditions, availability.
9/94	U-17735	LA	Louisiana Public Service Commission	Cajun Electric Power Cooperative	Evaluation of appropriate avoided cost rate.
9/94	U-19904	LA	Louisiana Public Service Commission	Gulf States Utilities	Revenue requirements.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
10/94	5258-U	GA	Georgia Public Service Commission	Southern Bell Telephone & Telegraph Co.	Proposals to address competition in telecommunication markets.
11/94	EC94-7-000 ER94-898-000	FERC	Louisiana Public Service Commission	El Paso Electric and Central and Southwest	Merger economics, transmission equalization hold harmless proposals.
2/95	941-430EG	CO	CF&I Steel, L.P.	Public Service Company of Colorado	Interruptible rates, cost-of-service.
4/95	R-00943271	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Cost-of-service, allocation of rate increase, rate design, interruptible rates.
6/95	C-00913424 C-00946104	PA	Duquesne Interruptible Complainants	Duquesne Light Co.	Interruptible rates.
8/95	ER95-112 -000	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Open Access Transmission Tariffs - Wholesale.
10/95	U-21485	LA	Louisiana Public Service Commission	Gulf States Utilities Company	Nuclear decommissioning, revenue requirements, capital structure.
10/95	ER95-1042 -000	FERC	Louisiana Public Service Commission	System Energy Resources, Inc.	Nuclear decommissioning, revenue requirements.
10/95	U-21485	LA	Louisiana Public Service Commission	Gulf States Utilities Co.	Nuclear decommissioning and cost of debt capital, capital structure.
11/95	I-940032	PA	Industrial Energy Consumers of Pennsylvania	State-wide - all utilities	Retail competition issues.
7/96	U-21496	LA	Louisiana Public Service Commission	Central Louisiana Electric Co.	Revenue requirement analysis.
7/96	8725	MD	Maryland Industrial Group	Baltimore Gas & Elec. Co., Potomac Elec. Power Co., Constellation Energy Co.	Ratemaking issues associated with a Merger.
8/96	U-17735	LA	Louisiana Public Service Commission	Cajun Electric Power Cooperative	Revenue requirements.
9/96	U-22092	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Decommissioning, weather normalization, capital structure.
2/97	R-973877	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Competitive restructuring policy issues, stranded cost, transition charges.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
6/97	Civil Action No. 94-11474	US Bankruptcy Court Middle District of Louisiana	Louisiana Public Service Commission	Cajun Electric Power Cooperative	Confirmation of reorganization plan; analysis of rate paths produced by competing plans.
6/97	R-973953	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Retail competition issues, rate unbundling, stranded cost analysis.
6/97	8738	MD	Maryland Industrial Group	Generic	Retail competition issues
7/97	R-973954	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Retail competition issues, rate unbundling, stranded cost analysis.
10/97	97-204	KY	Alcan Aluminum Corp. Southwire Co.	Big River Electric Corp.	Analysis of cost of service issues - Big Rivers Restructuring Plan
10/97	R-974008	PA	Metropolitan Edison Industrial Users	Metropolitan Edison Co.	Retail competition issues, rate unbundling, stranded cost analysis.
10/97	R-974009	PA	Pennsylvania Electric Industrial Customer	Pennsylvania Electric Co.	Retail competition issues, rate unbundling, stranded cost analysis.
11/97	U-22491	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Decommissioning, weather normalization, capital structure.
11/97	P-971265	PA	Philadelphia Area Industrial Energy Users Group	Enron Energy Services Power, Inc./ PECO Energy	Analysis of Retail Restructuring Proposal.
12/97	R-973981	PA	West Penn Power Industrial Intervenor	West Penn Power Co.	Retail competition issues, rate unbundling, stranded cost analysis.
12/97	R-974104	PA	Duquesne Industrial Intervenor	Duquesne Light Co.	Retail competition issues, rate unbundling, stranded cost analysis.
3/98 (Allocated Stranded Cost Issues)	U-22092	LA	Louisiana Public Service Commission	Gulf States Utilities Co.	Retail competition, stranded cost quantification.
3/98	U-22092	LA	Louisiana Public Service Commission	Gulf States Utilities, Inc.	Stranded cost quantification, restructuring issues.
9/98	U-17735	LA	Louisiana Public Service Commission	Cajun Electric Power Cooperative, Inc.	Revenue requirements analysis, weather normalization.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
12/98	8794	MD	Maryland Industrial Group and Millennium Inorganic Chemicals Inc.	Baltimore Gas and Electric Co.	Electric utility restructuring, stranded cost recovery, rate unbundling.
12/98	U-23358	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Nuclear decommissioning, weather normalization, Entergy System Agreement.
5/99 (Cross- 40-000 Answering Testimony)	EC-98-	FERC	Louisiana Public Service Commission	American Electric Power Co. & Central South West Corp.	Merger issues related to market power mitigation proposals.
5/99 (Response Testimony)	98-426	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co.	Performance based regulation, settlement proposal issues, cross-subsidies between electric. And gas services.
6/99	98-0452	WV	West Virginia Energy Users Group	Appalachian Power, Monongahela Power, & Potomac Edison Companies	Electric utility restructuring, stranded cost recovery, rate unbundling.
7/99	99-03-35	CT	Connecticut Industrial \Energy Consumers	United Illuminating Company	Electric utility restructuring, stranded cost recovery, rate unbundling.
7/99	Adversary Proceeding No. 98-1065	U.S. Bankruptcy Court	Louisiana Public Service Commission	Cajun Electric Power Cooperative	Motion to dissolve preliminary injunction.
7/99	99-03-06	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Electric utility restructuring, stranded cost recovery, rate unbundling.
10/99	U-24182	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Nuclear decommissioning, weather normalization, Entergy System Agreement.
12/99	U-17735	LA	Louisiana Public Service Commission	Cajun Electric Power Cooperative, Inc.	Ananlysi of Proposed Contract Rates, Market Rates.
03/00	U-17735	LA	Louisiana Public Service Commission	Cajun Electric Power Cooperative, Inc.	Evaluation of Cooperative Power Contract Elections
03/00	99-1658-EL-ETP	OH	AK Steel Corporation	Cincinnati Gas & Electric Co.	Electric utility restructuring, stranded cost recovery, rate Unbundling.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
08/00	98-0452 E-GI	WV	West Virginia Energy Users Group	Appalachian Power Co. American Electric Co.	Electric utility restructuring rate unbundling.
08/00	00-1050 E-T 00-1051-E-T	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Electric utility restructuring rate unbundling.
09/00	00-1178-E-T	WV	West Virginia Energy Users Group	Appalachian Power Co. Wheeling Power Co.	Electric utility restructuring rate unbundling
10/00	SOAH 473- 00-1020 PUC 2234	TX	The Dallas-Fort Worth Hospital Council and The Coalition of Independent Colleges And Universities	TXU, Inc.	Electric utility restructuring rate unbundling.
12/00	U-24993	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Nuclear decommissioning, revenue requirements.
12/00	EL00-66- 000 & ER00-2854 EL95-33-002	LA	Louisiana Public Service Commission	Entergy Services Inc.	Inter-Company System Agreement: Modifications for retail competition, interruptible load.
04/01	U-21453, U-20925, U-22092 (Subdocket B) Addressing Contested Issues	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Jurisdictional Business Separation - Texas Restructuring Plan
10/01	14000-U	GA	Georgia Public Service Commission Adversary Staff	Georgia Power Co.	Test year revenue forecast.
11/01	U-25687	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Nuclear decommissioning requirements transmission revenues.
11/01	U-25965	LA	Louisiana Public Service Commission	Generic .	Independent Transmission Company ("Transco"). RTO rate design.
03/02	001148-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Company	Retail cost of service, rate design, resource planning and demand side management.
06/02	U-25965	LA	Louisiana Public Service Commission	Entergy Gulf States Entergy Louisiana	RTO Issues
07/02	U-21453	LA	Louisiana Public Service Commission	SWEPCO, AEP	Jurisdictional Business Sep. - Texas Restructuring Plan.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
08/02	U-25888	LA	Louisiana Public Service Commission	Entergy Louisiana, Inc. Entergy Gulf States, Inc.	Modifications to the Inter-Company System Agreement, Production Cost Equalization.
08/02	EL01-88-000	FERC	Louisiana Public Service Commission	Entergy Services Inc. and the Entergy Operating Companies	Modifications to the Inter-Company System Agreement, Production Cost Equalization.
11/02	02S-315EG	CO	CF&I Steel & Climax Molybdenum Co.	Public Service Co. of Colorado	Fuel Adjustment Clause
01/03	U-17735	LA	Louisiana Public Service Commission	Louisiana Coops	Contract Issues
02/03	02S-594E	CO	Cripple Creek and Victor Gold Mining Co.	Aquila, Inc.	Revenue requirements, purchased power.
04/03	U-26527	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Weather normalization, power purchase expenses, System Agreement expenses.
11/03	ER03-753-000	FERC	Louisiana Public Service Commission Staff	Entergy Services, Inc. and the Entergy Operating Companies	Proposed modifications to System Agreement Tariff MSS-4.
11/03	ER03-583-000 ER03-583-001 ER03-583-002 ER03-681-000, ER03-681-001 ER03-682-000, ER03-682-001 ER03-682-002	FERC	Louisiana Public Service Commission	Entergy Services, Inc., the Entergy Operating Companies, EWO Market-Ing, L.P., and Entergy Power, Inc.	Evaluation of Wholesale Purchased Power Contracts.
12/03	U-27136	LA	Louisiana Public Service Commission	Entergy Louisiana, Inc.	Evaluation of Wholesale Purchased Power Contracts.
01/04	E-01345-03-0437	AZ	Kroger Company	Arizona Public Service Co.	Revenue allocation rate design.
02/04	00032071	PA	Duquesne Industrial Intervenor	Duquesne Light Company	Provider of last resort issues.
03/04	03A-436E	CO	CF&I Steel, LP and Climax Molybdenum	Public Service Company of Colorado	Purchased Power Adjustment Clause.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
04/04	2003-00433 2003-00434	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co. Kentucky Utilities Co.	Cost of Service Rate Design
0-6/04	03S-539E	CO	Cripple Creek, Victor Gold Mining Co., Goodrich Corp., Holcim (U.S.), Inc., and The Trane Co.	Aquila, Inc.	Cost of Service, Rate Design Interruptible Rates
06/04	R-00049255	PA	PP&L Industrial Customer Alliance PPLICA	PPL Electric Utilities Corp.	Cost of service, rate design, tariff issues and transmission service charge.
10/04	04S-164E	CO	CF&I Steel Company, Climax Mines	Public Service Company of Colorado	Cost of service, rate design, Interruptible Rates.
03/05	Case No. 2004-00426 Case No. 2004-00421	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Louisville Gas & Electric Co.	Environmental cost recovery.
06/05	050045-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Company	Retail cost of service, rate design
07/05	U-28155	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, Inc. Entergy Gulf States, Inc.	Independent Coordinator of Transmission – Cost/Benefit
09/05	Case Nos. 05-0402-E-CN 05-0750-E-PC	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Environmental cost recovery, Securitization, Financing Order
01/06	2005-00341	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Cost of service, rate design, transmission expenses. Congestion Cost Recovery Mechanism
03/06	U-22092	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Separation of EGSI into Texas and Louisiana Companies.
03/06	05-1278-E-PC -PW-42T	WV	West Virginia Energy Users Group	Appalachian Power Co. Wheeling Power Co.	Retail cost of service, rate design.
04/06	U-25116	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, Inc.	Transmission Prudence Investigation
06/06	R-00061346 C0001-0005	PA	Duquesne Industrial Intervenors & IECPA	Duquesne Light Co.	Cost of Service, Rate Design, Transmission Service Charge, Tariff Issues
06/06	R-00061366 R-00061367 P-00062213 P-00062214		Met-Ed Industrial Energy Users Group and Penelec Industrial Customer Alliance	Metropolitan Edison Co. Pennsylvania Electric Co.	Generation Rate Cap, Transmission Service Charge, Cost of Service, Rate Design, Tariff Issues
07/06	U-22092 Sub-J	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Separation of EGSI into Texas and Louisiana Companies.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdic.	Party	Utility	Subject
07/06	Case No. 2006-00130 Case No. 2006-00129	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Louisville Gas & Electric Co.	Environmental cost recovery.
08/06	Case No. PUE-2006-00065	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Co.	Cost Allocation, Allocation of Rev Incr, Off-System Sales margin rate treatment
09/06	E-01345A-05-0816	AZ	Kroger Company	Arizona Public Service Co.	Revenue allocation, cost of service, rate design.
11/06	Doc. No. 97-01-15RE02	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power United Illuminating	Rate unbundling issues.
01/07	Case No. 06-0960-E-42T	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Retail Cost of Service Revenue apportionment
03/07	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc. Entergy Louisiana, LLC	Implementation of FERC Decision Jurisdictional & Rate Class Allocation
05/07	Case No. 07-63-EL-UNC	OH	Ohio Energy Group	Ohio Power, Columbus Southern Power	Environmental Surcharge Rate Design
05/07	R-00049255 Remand	PA	PP&L Industrial Customer Alliance PPLICA	PPL Electric Utilities Corp.	Cost of service, rate design, tariff issues and transmission service charge.
06/07	R-00072155	PA	PP&L Industrial Customer Alliance PPLICA	PPL Electric Utilities Corp.	Cost of service, rate design, tariff issues.
07/07	Doc. No. 07F-037E	CO	Gateway Canyons LLC	Grand Valley Power Coop.	Distribution Line Cost Allocation
09/07	Doc. No. 05-UR-103	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Electric Power Co.	Cost of Service, rate design, tariff Issues, Interruptible rates.
11/07	ER07-682-000	FERC	Louisiana Public Service Commission Staff	Entergy Services, Inc. and the Entergy Operating Companies	Proposed modifications to System Agreement Schedule MSS-3. Cost functionalization issues.
1/08	Doc. No. 20000-277-ER-07	WY	Cimarex Energy Company	Rocky Mountain Power (PacifiCorp)	Vintage Pricing, Marginal Cost Pricing Projected Test Year
1/08	Case No. 07-551	OH	Ohio Energy Group	Ohio Edison, Toledo Edison Cleveland Electric Illuminating	Class Cost of Service, Rate Restructuring, Apportionment of Revenue Increase to Rate Schedules
2/08	ER07-956	FERC	Louisiana Public Service Commission Staff	Entergy Services, Inc. and the Entergy Operating Companies	Entergy's Compliance Filing System Agreement Bandwidth Calculations.
2/08	Doc No. P-00072342	PA	West Penn Power Industrial Intervenor	West Penn Power Co.	Default Service Plan issues.
3/08	Doc No. E-01933A-05-0650	AZ	Kroger Company	Tucson Electric Power Co.	Cost of Service, Rate Design

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
05/08	08-0278 E-GI	WV	West Virginia Energy Users Group	Appalachian Power Co. American Electric Power Co.	Expanded Net Energy Cost "ENEC" Analysis.
6/08	Case No. 08-124-EL-ATA	OH	Ohio Energy Group	Ohio Edison, Toledo Edison Cleveland Electric Illuminating	Recovery of Deferred Fuel Cost
7/08	Docket No. 07-035-93	UT	Kroger Company	Rocky Mountain Power Co.	Cost of Service, Rate Design
08/08	Doc. No. 6680-UR-116	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Co.	Cost of Service, rate design, tariff Issues, Interruptible rates.
09/08	Doc. No. 6690-UR-119	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Public Service Co.	Cost of Service, rate design, tariff Issues, Interruptible rates.
09/08	Case No. 08-936-EL-SSO	OH	Ohio Energy Group	Ohio Edison, Toledo Edison Cleveland Electric Illuminating	Provider of Last Resort Competitive Solicitation
09/08	Case No. 08-935-EL-SSO	OH	Ohio Energy Group	Ohio Edison, Toledo Edison Cleveland Electric Illuminating	Provider of Last Resort Rate Plan
09/08	Case No. 08-917-EL-SSO 08-918-EL-SSO	OH	Ohio Energy Group	Ohio Power Company Columbus Southern Power Co.	Provider of Last Resort Rate Plan
10/08	2008-00251 2008-00252	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co. Kentucky Utilities Co.	Cost of Service, Rate Design
11/08	08-1511 E-GI	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Expanded Net Energy Cost "ENEC" Analysis.
11/08	M-2008- 2036188, M- 2008-2036197	PA	Met-Ed Industrial Energy Users Group and Penelec Industrial Customer Alliance	Metropolitan Edison Co. Pennsylvania Electric Co.	Transmission Service Charge
01/09	ER08-1056	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Entergy's Compliance Filing System Agreement Bandwidth Calculations.
01/09	E-01345A- 08-0172	AZ	Kroger Company	Arizona Public Service Co.	Cost of Service, Rate Design
02/09	2008-00409	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative, Inc.	Cost of Service, Rate Design
5/09	PUE-2009 -00018	VA	VA Committee For Fair Utility Rates	Dominion Virginia Power Company	Transmission Cost Recovery Rider
5/09	09-0177- E-GI	WV	West Virginia Energy Users Group	Appalachian Power Company	Expanded Net Energy Cost "ENEC" Analysis
6/09	PUE-2009 -00016	VA	VA Committee For Fair Utility Rates	Dominion Virginia Power Company	Fuel Cost Recovery Rider

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdiction	Party	Utility	Subject
6/09	PUE-2009-00038	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Company	Fuel Cost Recovery Rider
7/09	080677-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Company	Retail cost of service, rate design
8/09	U-20925 (RRF 2004)	LA	Louisiana Public Service Commission Staff	Entergy Louisiana LLC	Interruptible Rate Refund Settlement
9/09	09AL-299E	CO	CF&I Steel Company Climax Molybdenum	Public Service Company of Colorado	Energy Cost Rate issues
9/09	Doc. No. 05-UR-104	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Electric Power Co.	Cost of Service, rate design, tariff Issues, Interruptible rates.
9/09	Doc. No. 6680-UR-117	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Co.	Cost of Service, rate design, tariff Issues, Interruptible rates.
10/09	Docket No. 09-035-23	UT	Kroger Company	Rocky Mountain Power Co.	Cost of Service, Allocation of Rev Increase
10/09	09AL-299E	CO	CF&I Steel Company Climax Molybdenum	Public Service Company of Colorado	Cost of Service, Rate Design
11/09	PUE-2009-00019	VA	VA Committee For Fair Utility Rates	Dominion Virginia Power Company	Cost of Service, Rate Design
11/09	09-1485 E-P	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Expanded Net Energy Cost "ENEC" Analysis.
12/09	Case No. 09-906-EL-SSO	OH	Ohio Energy Group	Ohio Edison, Toledo Edison Cleveland Electric Illuminating	Provider of Last Resort Rate Plan
12/09	ER09-1224	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Entergy's Compliance Filing System Agreement Bandwidth Calculations.
12/09	Case No. PUE-2009-00030	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Co.	Cost Allocation, Allocation of Rev Increase, Rate Design
2/10	Docket No. 09-035-23	UT	Kroger Company	Rocky Mountain Power Co.	Rate Design
3/10	Case No. 09-1352-E-42T	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Retail Cost of Service Revenue apportionment
3/10	E015/GR-09-1151	MN	Large Power Intervenors	Minnesota Power Co.	Cost of Service, rate design
4/10	EL09-61	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement Issues Related to off-system sales
4/10	2009-00459	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Cost of service, rate design, transmission expenses.

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
4/10	2009-00548 2009-00549	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co. Kentucky Utilities Co.	Cost of Service, Rate Design
7/10	R-2010- 2161575	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Company	Cost of Service, Rate Design
09/10	2010-00167	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative, Inc.	Cost of Service, Rate Design
09/10	10M-245E	CO	CF&I Steel Company Climax Molybdenum	Public Service Company of Colorado	Economic Impact of Clean Air Act
11/10	10-0699- E-42T	WV	West Virginia Energy Users Group	Appalachian Power Company	Cost of Service, Rate Design, Transmission Rider
11/10	Doc. No. 4220-UR-116	WI	Wisconsin Industrial Energy Group, Inc.	Northern States Power Co. Wisconsin	Cost of Service, rate design
12/10	10A-554EG	CO	CF&I Steel Company Climax Molybdenum	Public Service Company	Demand Side Management Issues
12/10	10-2586-EL- SSO	OH	Ohio Energy Group	Duke Energy Ohio	Provider of Last Resort Rate Plan Electric Security Plan
3/11	20000-384- ER-10	WY	Wyoming Industrial Energy Consumers	Rocky Mountain Power Wyoming	Electric Cost of Service, Revenue Apportionment, Rate Design
5/11	2011-00036	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Cost of Service, Rate Design
6/11	Docket No. 10-035-124	UT	Kroger Company	Rocky Mountain Power Co.	Class Cost of Service
6/11	PUE-2011- -00045	VA	VA Committee For Fair Utility Rates	Dominion Virginia Power Company	Fuel Cost Recovery Rider
07/11	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc. Entergy Louisiana, LLC	Entergy System Agreement - Successor Agreement, Revisions, RTO Day 2 Market Issues
07/11	Case Nos. 11-346-EL-SSO 11-348-EL-SSO	OH	Ohio Energy Group	Ohio Power Company Columbus Southern Power Co.	Electric Security Rate Plan, Provider of Last Resort Issues
08/11	PUE-2011- 00034	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Co.	Cost Allocation, Rate Recovery of RPS Costs
09/11	2011-00161 2011-00162	KY	Kentucky Industrial Utility	Louisville Gas & Electric Co. Kentucky Utilities Company	Environmental Cost Recovery
09/11	Case Nos. 11-346-EL-SSO 11-348-EL-SSO	OH	Ohio Energy Group	Ohio Power Company Columbus Southern Power Co.	Electric Security Rate Plan, Stipulation Support Testimony
10/11	11-0452 E-P-T	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Energy Efficiency/Demand Reduction Cost Recovery

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
11/11	11-1272 E-P	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Expanded Net Energy Cost "ENEC" Analysis
11/11	E-01345A- 11-0224	AZ	Kroger Company	Arizona Public Service Co.	Decoupling
12/11	E-01345A- 11-0224	AZ	Kroger Company	Arizona Public Service Co.	Cost of Service, Rate Design
3/12	Case No. 2011-00401	KY	Kentucky Industrial Utility Consumers	Kentucky Power Company	Environmental Cost Recovery
4/12	2011-00036 Rehearing Case	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Cost of Service, Rate Design
5/12	2011-346 2011-348	OH	Ohio Energy Group	Ohio Power Company	Electric Security Rate Plan Interruptible Rate Issues
6/12	PUE-2012 -00051	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Company	Fuel Cost Recovery Rider
6/12	12-00012 12-00026	TN	Eastman Chemical Co. Air Products and Chemicals, Inc.	Kingsport Power Company	Demand Response Programs
6/12	Docket No. 11-035-200	UT	Kroger Company	Rocky Mountain Power Co.	Class Cost of Service
6/12	12-0275- E-GI	WV	West Virginia Energy Users Group	Appalachian Power Company	Energy Efficiency Rider
6/12	12-0399- E-P	WV	West Virginia Energy Users Group	Appalachian Power Company	Expanded Net Energy Cost ("ENEC")
7/12	120015-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Company	Retail cost of service, rate design
7/12	2011-00063	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Environmental Cost Recovery
8/12	Case No. 2012-00226	KY	Kentucky Industrial Utility Consumers	Kentucky Power Company	Real Time Pricing Tariff
9/12	ER12-1384	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy System Agreement, Cancelled Plant Cost Treatment
9/12	2012-00221 2012-00222	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co. Kentucky Utilities Co.	Cost of Service, Rate Design
11/12	12-1238 E-GI	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Expanded Net Energy Cost Recovery Issues
12/12	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Gulf States Louisiana	Purchased Power Contracts
12/12	EL09-61	FERC	Louisiana Public Service Service Commission	Entergy Services, Inc. and the Entergy Operating	System Agreement Issues Related to off-system sales

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
				Companies	Damages Phase
12/12	E-01933A-12-0291	AZ	Kroger Company	Tucson Electric Power Co.	Decoupling
1/13	12-1188 E-PC	WV	West Virginia Energy Users Group	Appalachian Power Company	Securitization of ENEC Costs
1/13	E-01933A-12-0291	AZ	Kroger Company	Tucson Electric Power Co.	Cost of Service, Rate Design
4/13	12-1571 E-PC	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Generation Resource Transition Plan Issues
4/13	PUE-2012-00141	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Company	Generation Asset Transfer Issues
6/13	12-1655 E-PC/11-1775-E-P	WV	West Virginia Energy Users Group	Appalachian Power Company	Generation Asset Transfer Issues
06/13	U-32675	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc. Entergy Louisiana, LLC	MISO Joint Implementation Plan Issues
7/13	130040-EI	FL	WCF Health Utility Alliance	Tampa Electric Company	Cost of Service, Rate Design
7/13	13-0467-E-P	WV	West Virginia Energy Users Group	Appalachian Power Company	Expanded Net Energy Cost ("ENEC")
7/13	13-0462-E-GI	WV	West Virginia Energy Users Group	Appalachian Power Company	Energy Efficiency Issues
8/13	13-0557-E-P	WV	West Virginia Energy Users Group	Appalachian Power Company	Right-of-Way, Vegetation Control Cost Recovery Surcharge Issues
10/13	2013-00199	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Ratemaking Policy Associated with Rural Economic Reserve Funds
10/13	13-0764-E-CN	WV	West Virginia Energy Users Group	Appalachian Power Company	Rate Recovery Issues – Clinch River Gas Conversion Project
11/13	R-2013-2372129	PA	United States Steel Corporation	Duquesne Light Company	Cost of Service, Rate Design
11/13	13A-0686EG	CO	CF&I Steel Company Climax Molybdenum	Public Service Company of Colorado	Demand Side Management Issues
11/13	13-1064-E-P	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Right-of-Way, Vegetation Control Cost Recovery Surcharge Issues
4/14	ER-432-002	FERC	Louisiana Public Service Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement Issues Related to Union Pacific Railroad Litigation Settlement
5/14	2013-2385 2013-2386	OH	Ohio Energy Group	Ohio Power Company	Electric Security Rate Plan Interruptible Rate Issues

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
5/14	14-0344-E-GI	WV	West Virginia Energy Users Group	Appalachian Power Company	Expanded Net Energy Cost ("ENEC")
5/14	14-0345-E-PC	WV	West Virginia Energy Users Group	Appalachian Power Company	Energy Efficiency Issues
5/14	Docket No. 13-035-184	UT	Kroger Company	Rocky Mountain Power Co.	Class Cost of Service
7/14	PUE-2014-00007	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Company	Renewable Portfolio Standard Rider Issues
7/14	ER13-2483	FERC	Bear Island Paper WB LLC	Old Dominion Electric Cooperative	Cost of Service, Rate Design Issues
8/14	14-0546-E-PC	WV	West Virginia Energy Users Group	Appalachian Power Company	Rate Recovery Issues – Mitchell Asset Transfer
8/14	PUE-2014-00026	VA	Old Dominion Committee	Appalachian Power Company	Biennial Review Case - Cost of Service Issues
9/14	14-841-EL-SSO	OH	Ohio Energy Group	Duke Energy Ohio	Electric Security Rate Plan Standard Service Offer
10/14	14-0702-E-42T	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Cost of Service, Rate Design
11/14	14-1550-E-P	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Expanded Net Energy Cost ("ENEC")
12/14	EL14-026	SD	Black Hills Power Industrial Interveners	Black Hills Power, Inc.	Cost of Service Issues
12/14	14-1152-E-42T	WV	West Virginia Energy Users Group	Appalachian Power Company	Cost of Service, Rate Design transmission, lost revenues
2/15	14-1297-EI-SSO	OH	Ohio Energy Group	Ohio Edison, Toledo Edison Cleveland Electric Illuminating	Electric Security Rate Plan Standard Service Offer
3/15	2014-00396	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Cost of service, rate design, transmission expenses.
3/15	2014-00371 2014-00372	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co. Kentucky Utilities Co.	Cost of Service, Rate Design
5/15	EL10-65	FERC	Louisiana Public Service Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement Issues Related to Interruptible load
5/15	15-0301-E-GI	WV	West Virginia Energy Users Group	Appalachian Power Company	Expanded Net Energy Cost ("ENEC")
5/15	15-0303-E-P	WV	West Virginia Energy Users Group	Appalachian Power Company, Wheeling Power Co.	Energy Efficiency/Demand Response

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
6/15	14-1580-EL- RDR	OH	Ohio Energy Group	Duke Energy Ohio	Energy Efficiency Rider Issues
7/15	EL10-65	FERC	Louisiana Public Service Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement Issues Related to Off-System Sales and Bandwidth Tariff
8/15	PUE-2015 -00034	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Company	Renewable Portfolio Standard Rider Issues
8/15	87-0669- E-P	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Cost of Service, Rate Design
11/15	D2015- 6.51	MT	Montana Large Customer Group	Montana Dakota Utilities Co.	Class Cost of Service, Rate Design
11/15	15-1351- E-P	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Expanded Net Energy Cost ("ENEC")
3/16	EL01-88 Remand	FERC	Louisiana Public Service Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement Issues Related to Bandwidth Tariff
5/16	16-0239- E-ENEC	WV	West Virginia Energy Users Group	Appalachian Power Company	Expanded Net Energy Cost ("ENEC")
6/16	E-01933A- 15-0322	AZ	Kroger Company	Tucson Electric Power Co.	Cost of Service, Rate Design
6/16	16-00001	TN	East Tennessee Energy Consumers	Kingsport Power Co.	Cost of Service, Rate Design
6/16	14-1297- EL-SS0-Rehearing	OH	Ohio Energy Group	Ohio Edison, Toledo Edison Cleveland Electric Illuminating	Electric Security Rate Plan Standard Service Offer
06/16	15-1734-E- T-PC	WV	West Virginia Energy Users Group	Appalachian Power Company, Wheeling Power Co.	Demand Response Rider
7/16	160021-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Company	Retail cost of service, rate design
7/16	16AL-0048E	CO	CF&I.Steel LP Climax Molybdenum	Public Service Company of Colorado	Cost of Service, Rate Design
7/16	16-0403- E-P	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Energy Efficiency/Demand Response
10/16	16-1121- E-ENEC	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Expanded Net Energy Cost ("ENEC")
11/16	16-0395- EL-SSO	OH	Ohio Energy Group	Dayton Power & Light	Electric Security Rate Plan
11/16	EL09-61-004 Remand	FERC	Louisiana Public Service Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement Issues Related to off-system sales Damages Phase

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
12/16	1139	D.C.	Healthcare Council of the National Capital Area	Potomac Electric Power Co.	Cost of Service, Rate Design
1/17	E-01345A-16-0036	AZ	Kroger	Arizona Public Service Co.	Cost of Service, Rate Design
2/17	16-1026-E-PC	WV	West Virginia Energy Users Group	Appalachian Power Co.	Wind Project Purchase Power Agreement
3/17	2016-00370 2016-00371	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co. Kentucky Utilities Co.	Cost of Service, Rate Design
5/17	16-1852	OH	Ohio Energy Group	Ohio Power Company	Electric Security Rate Plan Interruptible Rate Issues
7/17	17-00032	TN	East Tennessee Energy Consumers	Kingsport Power Co.	Vegetation Management Cost Recovery
8/17	17-0631-E-P	WV	West Virginia Energy Users Group	Monongahela Power Co.	Electric Energy Purchase Agreement
8/17	17-0296-E-PC	WV	West Virginia Energy Users Group	Monongahela Power Co.	Generation Resource Asset Transfer
9/17	2017-0179	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Cost of service, rate design, transmission cost recover.
9/17	17-0401-E-P	WV	West Virginia Energy Users Group	Appalachian Power Company	Energy Efficiency Issues
12/17	17-0894-E-PC	WV	West Virginia Energy Users Group	Appalachian Power Co.	Wind Project Asset Purchase
5/18	1150/ 1151	D.C.	Healthcare Council of the National Capital Area	Potomac Electric Power Co.	Cost of Service, Rate Design Tax Cut and Jobs Act Issues
6/18	17-00143	TN	East Tennessee Energy Consumers	Kingsport Power Co.	Storm Damage Rider Cost Recovery
7/18	18-0503-E-ENEC	WV	West Virginia Energy Users Group	Appalachian Power Company	Expanded Net Energy Cost ("ENEC")
7/18	18-0504-E-P	WV	West Virginia Energy Users Group	Appalachian Power Company	Vegetation Management Cost Recovery
7/18	G.O.236.1	WV	West Virginia Energy Users Group	Appalachian Power Company	Tax Cut and Jobs Act Issues
7/18	G.O.236.1	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Tax Cut and Jobs Act Issues
10/18	18-0646-E-42T	WV	West Virginia Energy Users Group	Appalachian Power Company	Cost of Service, Rate Design TCJA issues
10/18	18-00038	TN	East Tennessee Energy Consumers	Kingsport Power Co.	Tax Cut and Jobs Act Issues

**Expert Testimony Appearances
of
Stephen J. Baron
As of September 2020**

Date	Case	Jurisdct.	Party	Utility	Subject
11/18	18-1231-E-ENEC	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Expanded Net Energy Cost ("ENEC")
11/18	2018-00054	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Company	Tax Cut and Jobs Act Issues
12/18	2018-00134	VA	Collegiate Clean Energy	Appalachian Power Company	Competitive Service Provider Issues
1/19	2018-00294 2018-00295	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co. Kentucky Utilities Co.	Cost of Service, Rate Design
1/19	2018-00101	VA	VA Committee For Fair Utility Rates	Dominion Virginia Power Company	Cost of Service
2/19	UD-18-07	City of New Orleans	Crescent City Power Users Group	Entergy New Orleans	Cost of Service, Rate Design
4/19	42310	GA	Georgia Public Service Commission Staff	Georgia Power Company	2019 Integrated Resource Plan Optimal Reserve Margin Issues
7/19	19-0396 E-P	WV	West Virginia Energy Users Group	Appalachian Power Company	Energy Efficiency Issues
10/19	19-0387 E-PC	WV	West Virginia Energy Users Group	Appalachian Power Company	Economic Development Fund
10/19	19-0564 E-T	WV	West Virginia Energy Users Group	Appalachian Power Company	Mitchell Generating Plant Surcharge
10/19	E-01933A-19-0028	AZ	Kroger Company	Tucson Electric Power Co.	Cost of Service, Rate Design
11/19	19-0785 E-ENEC	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Expanded Net Energy Cost ("ENEC")
11/19	2018-00101	VA	VA Committee For Fair Utility Rates	Dominion Virginia Power Company	Cost of Service
11/19	2019-00170 -UT	NM	COG Operating, LLC	Southwestern Public Service Co.	Cost of Service, Rate Design
12/19	19-1028 E-PC	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	PURPA Contract Buy-out
4/20	20-00064	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Cooperative, Inc.	Rate Design
7/20	2019-226-E	SC	The South Carolina Office of Regulatory Staff	Dominion Energy South Carolina	2020 Integrated Resource Plan Load Forecasting, Reserve Margin Issue
7/20	2020-00015	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Company	2020 Triennial Review Case - Cost Allocation, Revenue Apportionment

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF:

**ELECTRONIC APPLICATION OF KENTUCKY POWER)
COMPANY FOR (1) A GENERAL ADJUSTMENT)
OF ITS RATES FOR ELECTRIC SERVICE;)
(2) APPROVAL OF TARIFFS AND RIDERS;)
(3) APPROVAL OF ACCOUNTING PRACTICES)
TO ESTABLISH REGULATORY ASSETS AND)
LIABILITIES; (4) APPROVAL OF A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY;)
AND (5) ALL OTHER REQUIRED APPROVALS)
AND RELIEF)**

Case No. 2020-00174

EXHIBIT__(SJB-2)

OF

STEPHEN J. BARON

ON BEHALF OF

THE KENTUCKY ATTORNEY GENERAL

AND

THE KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

**J. KENNEDY AND ASSOCIATES, INC.
ROSWELL, GEORGIA**

October 2020

Kentucky Power Company
KPSC Case No. 2020-00174
AG-KIUC First Set of Data Requests
Dated August 12, 2020
Page 1 of 2

DATA REQUEST

AG_KIUC_1_052 In the event that an AEP Operating Company terminates participation in the Transmission Agreement, provide a detailed description as to how such Company (e.g. KPCo) would receive transmission service pursuant to PJM. Specifically, address whether such individual Operating Company would become its own transmission zone within PJM. Please identify, without quantification, the types of costs that such an Operating Company would incur from PJM or PJM members for transmission service, other than the costs of the Operating Company's owned transmission facilities. For example, if KPCo were to terminate its participation in the AEP East Transmission Agreement, what are the principal costs (descriptive, not quantified) that would be charged to KPCo in addition to KPCo's owned transmission revenue requirements.

RESPONSE

The Company objects to this data request on the grounds that it is speculative and not reasonably calculated to the discovery of admissible evidence in this case. The Company further objects to the request on the grounds that it is vague and ambiguous, as the terms "types of costs" and "principal costs" do not have an intelligible meaning in the context of the question. The Company further objects to this request to the extent it purports to seek a legal opinion regarding the FERC-jurisdictional referenced transmission agreement. The Company additionally objects to this request to the extent it purports to request information about FERC-jurisdictional transmission rates. Subject to and without waiving these objections, the Company states as follows: The analysis requested does not exist.

In the event that an AEP Operating Company terminates participation in the Transmission Agreement, it would remain in the AEP Transmission Zone. Per Section 7.4 of the PJM Consolidated Transmission Owner's Agreement (CTOA):

For purposes of developing rates for service under the PJM Tariff, transmission rate Zones smaller than those shown in Attachment J to the PJM Tariff, or subzones of those Zones, shall not be permitted within the current boundaries of the PJM Region; provided, however, that additional Zones may be established if the current boundaries of the PJM Region is expanded to accommodate new Parties to this Agreement.

Kentucky Power Company
KPSC Case No. 2020-00174
AG-KIUC First Set of Data Requests
Dated August 12, 2020
Page 2 of 2

Thus, under Section 7.4 of the CTOA, such Operating Company would incur the same costs in which it incurs as part of the AEP Transmission Agreement (NITS, Schedule 1A, Schedule 12) associated with the entire AEP Zone. However, certain costs would be allocated differently. For example, NITS and Schedule 12 costs would be allocated based on the operating company's share of the single coincident peak (1CP) of the AEP Zone, rather than a 12CP share of the total costs assigned to AEP as prescribed by the Transmission Agreement.

Please also refer to the Company's response to KIUC_AG 1-42 and KIUC_AG 1-50.

Witness: Kelly D. Pearce

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

IN THE MATTER OF:

**ELECTRONIC APPLICATION OF KENTUCKY POWER)
COMPANY FOR (1) A GENERAL ADJUSTMENT)
OF ITS RATES FOR ELECTRIC SERVICE;)
(2) APPROVAL OF TARIFFS AND RIDERS;)
(3) APPROVAL OF ACCOUNTING PRACTICES)
TO ESTABLISH REGULATORY ASSETS AND)
LIABILITIES; (4) APPROVAL OF A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY;)
AND (5) ALL OTHER REQUIRED APPROVALS)
AND RELIEF)**

Case No. 2020-00174

EXHIBIT__(SJB-3)

OF

STEPHEN J. BARON

ON BEHALF OF

THE KENTUCKY ATTORNEY GENERAL

AND

THE KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

**J. KENNEDY AND ASSOCIATES, INC.
ROSWELL, GEORGIA**

October 2020

Kentucky Power Company
KPSC Case No. 2020-00174
AG-KIUC First Set of Data Requests
Dated August 12, 2020

DATA REQUEST

AG_KIUC_1_043 Please provide all studies, memoranda or other documents prepared by or for Kentucky Power analyzing the question of whether it would be more economically beneficial for Kentucky Power ratepayers if Kentucky Power terminated its participation in the August 4, 2010 Transmission Agreement between Appalachian Power, Columbus Southern, I&M, Kentucky Power, Kingsport Power, Ohio Power and Wheeling Power.

RESPONSE

The Company objects to this data request to the extent it purports to seek a legal opinion regarding the FERC-jurisdictional referenced transmission agreement. Subject to and without waiving this objection, the Company states as follows: the analysis requested does not exist.


Witness: Kelly D. Pearce

AFFIDAVIT

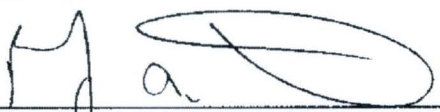
STATE OF GEORGIA)

COUNTY OF FULTON)

STEPHEN J. BARON, being duly sworn, deposes and states: that the attached is his sworn testimony and that the statements contained are true and correct to the best of his knowledge, information and belief.


Stephen J. Baron

Sworn to and subscribed before me on this
6th day of October 2020.



Notary Public

