COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC RATES AND APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS	)	**CASE NO. 2025-00113**

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC AND GAS RATES, AND APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS	)	**CASE NO. 2025-00114**

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

August 29, 2025

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DIRECT TESTIMONY OF STEPHEN J. BARON

I. QUALIFICATIONS AND SUMMARY

Q. Please state your name and business address.

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

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

A. I am an Executive Consultant in the firm of Kennedy and Associates, a firm of utility rate, planning, and economic consultants in Atlanta, Georgia.

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

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

Q. Please state your educational background and experience.

A. I graduated from the University of Florida in l972 with a B.A. degree with high honors in Political Science and significant coursework in Mathematics and Computer Science. In 1974, I received a Master of Arts Degree in Economics, also from the University of Florida.

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

I have 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, South Carolina, Texas, Utah, Virginia, West

Virginia, Wisconsin, Wyoming, the Federal Energy Regulatory Commission and in United States Bankruptcy Court.

A complete copy of my resume and my testimony appearances is contained in Baron Exhibit__(SJB-1).

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

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

Q. Have you previously testified in KU and LG&E rate proceedings before the Kentucky Public Service Commission?

A. Yes. I have testified in 19 KU and LG&E cases since 1981.

Q. What is the purpose of your testimony?

A. I address the Companies' testimony regarding class of cost of service, the allocation of the authorized revenue increase to rate classes, the proposed electric residential customer charges, the proposed LG&E residential gas customer charge and TODP and RTS rate design. In addition, I present testimony on the Companies' proposed Curtailable Service Rates 1 and 2 ("CSR-1", "CSR-2").

With regard to class cost of service, the Companies' have filed a 6 Coincident Peak ("6 CP") class cost of service study ("CCOSS") which I believe provides a reasonable methodology to allocate production demand costs among each Company's rate classes. As discussed by Companies' witness Timothy Lyons, LG&E and KU are proposing a very mitigated allocation of the overall revenue increase in this case that gradually moves class rates towards cost of service. I will address the revenue allocation issue and recommend that a portion of any Commission authorized reduction in each Company's requested revenue increase be used to partially reduce the subsidies paid by energy intensive industrial manufacturers.

With regard to the residential electric and gas customer charges, I will respond to the Companies' proposals to substantially increase these charges and recommend an approach to first use any Commission authorized reduction in each Company's requested revenue increase to the residential class to mitigate their respective proposed residential customer charge increases.

With regard to rate design issues for LG&E and KU Rates TODP and RTS, I will discuss the Companies' proposal to substantially increase the energy charges of these rates, relative to the demand charges. All else being equal, this has the effect of substantially burdening large, high load factor customers on these rate schedules. I will discuss these rates and recommend an alternative set of energy and demand charge increases that are revenue neutral within each rate schedule.

With regard to the Companies' curtailable service rates, CSR-1 and CSR-2, I will present testimony supporting an increase in these interruptible credits, based on significant increases in the costs of combustion turbine generating capacity that forms the basis for these interruptible credits.

Q. Would you please summarize your testimony?

A. Yes. I recommend and conclude the following:

- **The Companies' proposed 6 CP class cost of service methodology is reasonable and appropriate for LG&E and KU and should be accepted by the Commission. The 6 CP study uses a more traditional class cost of service methodology, which reasonably reflects cost causation associated with the need for generation resources.**

- **LG&E's and KU's proposed rate increases for the residential electric and gas rates should be mitigated to the extent that the Commission's approved decision in this case results in a lower overall increase to the residential rate class. As described in my testimony, a portion of any such Commission authorized reduction in the residential revenue increase should be applied first to reduce the Companies' proposed customer charge increases.**

- **The Companies' proposed apportionment of the overall requested revenue increase, that gradually moves rates toward cost of service should be approved. However, to the extent that the Commission authorizes revenue increases for LG&E and KU that are lower than each Company's requested increase, a portion of the Commission revenue reduction should be applied to reduce the subsidies that would be paid by LG&E Rates PTOD and RTS and KU Rates PTOD, RTS and FLS. The remaining**

revenue adjustment amount should be allocated to reduce the revenue increases for all rate classes on a uniform percentage basis.

- **The Companies' proposed rate design for rates TODP and RTS should be revised. The actual variable production cost for each of the Companies is much lower than each of the Companies' proposed charges. The proposed energy charges for these rates incorporate increases in the range of 19% to 25%. I recommend that the energy charges for rates TODP and RTS be set at an adjusted calculation of unit variable energy cost.**

- **The Companies are proposing to once again maintain the current level of the CSR-1 and CSR-2 curtailable service rate credits that are provided to customers who agree to be interrupted during periods when the Companies need additional capacity to provide reliable service. Based on an analysis of the current cost of combustion turbine capacity, which forms the basis of the CSR-1 and CSR-2 credits, the credits should be increased by a very significant amount (more than 100%). Notwithstanding this, I recommend that the credits be increased by $2.50/kVa, which represents only a portion of the avoided capacity costs based on recent combustion turbine cost data.**

II. CLASS COST OF SERVICE AND REVENUE APPORTIONMENT

Q. Have you reviewed the Companies' proposed class cost of service studies filed in this case?

A. Yes. The Companies have each filed a class cost of service study that allocates production demand related costs using a traditional 6 CP methodology. I support the Companies' use of a 6 CP methodology and believe that it reasonably apportions production demand costs to rate classes. For many years, the Companies used the Base Intermediate Peak ("BIP") methodology. In recent years, the Companies have presented alternative approaches using methodologies such as the loss of load probability production demand allocation method ("LOLP"); but have also presented cost studies using a traditional a traditional 6 CP methodology. In this case, the Companies have only presented a 6 CP class cost of service studies, which is appropriate, and recognizes the important factors impacting the need for generation resources. In the Companies' prior rate cases (Case Nos. 2020-00349 and 00350), LG&E/KU witness Steven Seelye stated at page 108 of his Direct Testimony, as follows:

> Q. Do you have a preference between the two alternative methodologies?
>
> A. Yes. The 6 CP methodology more accurately reflects the Companies' generation planning than the 12 CP methodology. The Companies' system is summer peaking but the Companies also have a large winter peak. Therefore, the Companies give considerable attention to the winter peak demands, particularly in selecting the type of generation resources needed to meet both the summer and [winter] peak demands. But very little consideration is given to the system peak demands during the spring and fall months. Because the 12 CP methodology includes monthly demands for shoulder months such as March, April, May, October, and November, the methodology gives too much weight to demands for months that play little or no role in planning. By including demands for four summer months and two winter months, the 6 CP gives an appropriate weighting to the allocation of production costs for a summer peaking utility with a winter peak that is nearly as high as the summer peak. For these reasons, I favor the 6 CP over the 12 CP methodology.

Q. Has the 6 CP production demand allocation methodology been used by other utilities in Kentucky?

A. Yes. East Kentucky Electric Cooperative has employed the 6 CP methodology in a 2008 case (2008-00409).

Q. What is your overall conclusion regarding the Companies use of the 6 CP methodology in this case?

A. I strongly support the 6 CP methodology and recommend that the Commission adopt the Companies' class cost of service studies in this case.

Q. Are there any issues with the Companies' class cost of service study that you have identified?

A. In prior testimony (2020, 2018 and 2016 KU rate cases), I discussed a provision in Rate FLS that permits KU to interrupt 95% of the customer's FLS load on 5 minutes notice for up to 10 minutes and up to 20 times per month. There is only one FLS customer and its demand is approximately 200 MW. This provision of Rate FLS allows KU to use its FLS customer as a system reliability resource. This interruptible provision and system benefit has not been factored into the KU's cost of service study. This interruptible provision of Rate FLS is not connected with the Company's CRS-1 and CRS-2 curtailable riders, which are completely separate.

All else being equal, to the extent that there is an interruptible benefit that is not accounted for in the cost allocation study, the resulting rate of return shown for

Rate FLS would be understated and the reported subsidies paid by KU's FLS customer would be greater than reported in the class cost of service study. Notwithstanding this, I am not proposing any adjustment to KU's class cost of service study to reflect this Rate FLS interruptible provision.

Q. Before addressing the results of the Companies' cost of service studies, would you briefly explain the ratemaking concept of a "subsidy" in the context of an electric utility class cost of service study?

A. The terms "subsidy" or "cross-subsidization" in the context of ratemaking and cost allocation mean that one or more rate classes is providing dollar payments to one or more other rate classes by paying rates in excess of the cost of providing service to those "subsidy paying" rate classes. While the quantification of a subsidy paid or received by a rate class is dependent on the class cost of service methodology used to determine the cost of serving each rate class, the amount of subsidies paid and received can readily be calculated based on the cost of service study results.[1]

Q. What are the results of the Companies' 6 CP cost of service study?

A. Tables 1 and 2 summarize the rates of return and relative rates of return at present rates, as well as the current dollar subsidies. A positive subsidy value indicates that

[1] The subsidy paid or received by a rate class is equal to the difference between the rate of return for the class, as produced by the cost study, times the classes' rate base times the gross revenue conversion factor. The sum of all subsidies paid or received for each utility is equal to $0.

the rate class is receiving a subsidy from other rate classes; a negative subsidy value indicates that the rate class is paying a subsidy.

Table 1
LG&E Class Cost of Service Summary

	Present ROR	Present Subsidy	Subsidy at Proposed Rates*	Equal ROR Increase
RS	2.50%	88,030,687	78,939,464	131,718,549
GS	12.88%	(34,999,957)	(28,825,536)	(17,174,030)
PS-Sec	12.37%	(26,097,788)	(22,425,311)	(12,133,319)
PS-Pri	15.28%	(1,406,966)	(1,232,278)	(815,424)
TOD-Sec	9.98%	(13,882,224)	(13,136,868)	(3,400,541)
TOD-Pri	8.32%	(8,838,093)	(10,434,075)	1,529,921
RTS - Trans.	8.47%	(3,539,762)	(4,931,850)	399,682
SCC	3.10%	394,293	227,599	643,416
LS & RLS	5.93%	115,491	1,698,770	3,950,003
LE	15.03%	(69,651)	(64,565)	(39,881)
TE	9.54%	(40,324)	(34,614)	(6,885)
OSL	24.13%	(6,569)	(4,615)	(4,609)
EV	-15.78%	246,834	223,880	231,255
SSP	2.31%	92,357	-	134,719
BS	3.08%	1,672	-	2,717
Total Retail	6.00%	0	-	105,035,574

* Subsidy based on Lyons' Class Revenues (Schedule 4)- Difference between proposed revenues and revenues at equal ROR.

Table 2
KU Class Cost of Service Summary

	Present ROR	Present Subsidy	Subsidy at Proposed Rates*	Equal ROR Increase
RS	1.92%	136,652,066	129,801,845	233,988,780
GS	13.46%	(65,360,196)	(55,927,784)	(29,182,822)
AES	7.00%	(730,612)	(672,183)	847,712
PS-Sec	13.94%	(41,754,034)	(37,262,362)	(19,614,181)
PS-Pri	14.13%	(2,382,926)	(2,134,877)	(1,139,185)
TOD-Sec	6.99%	(7,899,188)	(9,497,103)	9,282,964
TOD-Pri	6.77%	(11,860,006)	(17,579,420)	17,803,872
RTS - Trans.	6.04%	(1,953,815)	(5,595,931)	8,671,849
FLS - Trans.	7.14%	(1,871,067)	(850,366)	1,864,692
LS & RLS	7.03%	(3,045,206)	(392,349)	3,416,645
LE	6.02%	(6,659)	(14,296)	30,433
TE	8.86%	(27,396)	(25,607)	2,085
OSL	32.83%	(51,313)	(37,483)	(36,999)
EV	-17.95%	199,713	187,918	193,011
SSP	2.20%	101,606	-	181,347
BS	7.73%	(10,968)	-	5,716
Retail Total	5.45%	0	(0)	226,315,920

* Subsidy based on Lyons' Class Revenues (Schedule 4)- Difference between proposed revenues and revenues at equal ROR.

Q. Does the Companies' proposed revenue increase methodology reduce the current dollar level of subsidies?

A. For large industrial and manufacturing customers on Rates TODP and RTS, the Companies methodology actually substantially increases the subsidies paid. For the residential rate class of each Company, dollar subsidies are reduced by about 9% for LG&E and 5% for KU.

Q. How are the Companies' proposing to allocate the overall revenue increases to rate classes?

A. As described by Companies' witness Timothy Lyons, LG&E and KU are proposing to allocate their requested revenue increases ($105.0 million for LG&E, $226.3 million for KU) in a manner that would move each rate class partially, and very gradually, toward full cost of service. Specifically, Mr. Lyons states on page 40 of his Direct testimony that "the class revenue targets were set based on a 10.0 percent movement toward cost-of service rates for each rate class." Tables 3 and 4 show the Companies' proposed revenue increases for each rate class.

Table 3 LG&E Proposed Revenue Increases			
	Present Revenues	**Proposed Increase**	**Percent**
RS	510,989,021	52,779,084	10.3%
GS	172,472,836	11,651,506	6.8%
PS-Sec	148,430,855	10,291,992	6.9%
PS-Pri	6,429,829	416,855	6.5%
TOD-Sec	129,996,561	9,736,327	7.5%
TOD-Pri	152,375,560	11,963,995	7.9%
RTS - Trans.	68,267,256	5,331,532	7.8%
SCC	4,534,484	415,817	9.2%
LS & RLS	23,947,842	2,251,233	9.4%
LE	369,589	24,684	6.7%
TE	366,305	27,729	7.6%
OSL	14,321	6	0.0%
EV	55,251	7,375	13.3%
SSP	265,394	134,719	50.8%
BS	8,765	2,717	31.0%
Total	1,218,523,867	105,035,574	8.6%

Table 4
KU Proposed Revenue Increases

	Present Revenues	Proposed Increase	Percent
RS	741,466,479	104,186,935	14.1%
GS	272,241,062	26,744,962	9.8%
AES	13,171,291	1,519,896	11.5%
PS-Sec	179,971,469	17,648,181	9.8%
PS-Pri	10,183,697	995,692	9.8%
TOD-Sec	163,839,995	18,780,068	11.5%
TOD-Pri	308,400,771	35,383,292	11.5%
RTS - Trans.	122,988,078	14,267,780	11.6%
FLS - Trans.	23,206,906	2,715,057	11.7%
LS & RLS	31,822,538	3,808,994	12.0%
LE	382,365	44,729	11.7%
TE	252,098	27,692	11.0%
OSL	94,429	484	0.5%
EV	45,249	5,093	11.3%
SSP	189,766	181,347	95.6%
BS	53,798	5,716	10.6%
Total	1,868,309,993	226,315,920	12.1%

Q. Do you object to the Companies' revenue apportionment?

A. No, I do not object to their proposal. However, while I support the movement of class rates towards cost of service and a goal of a gradual reduction in subsidies, the Companies' methodology is not unreasonable in these two cases. Of course, it should be noted that the proposed rate class revenue increases shown in Tables 3 and 4 are based on the Companies' requested revenue increases. To the extent that the Commission reduces the Companies' overall revenue increases, however, there is an opportunity to further address subsidy reductions.

Q. Should the Commission focus the subsidy reductions on large industrial rate classes?

A. Yes. Large industrial customers are highly sensitive to competitive pressures, both nationally and internationally. For these industrial rate classes, whose customers must compete regionally, nationally and internationally, reducing the subsidies they pay in electric power rates would encourage continued operation and expansion of production facilities and help to maintain and grow jobs in Kentucky. While it is true that commercial customers on other general service rate schedules are also paying subsidies, these customers generally compete locally with other customers on the LG&E and KU system taking service on the same rate schedules. For these commercial customers, electric cost is competitively neutral.

Q. Has the Commission previously approved a similar approach that only addresses subsidies being paid by large industrial rate classes?

A. Yes. In Kentucky Power Company's 2017 base rate case (Case No. 2017-00179), the Commission approved a settlement that included a revenue apportionment methodology that I recommended, which involved a two-step process that fully eliminated the subsidies being paid by large Industrial Rate IGS. In that settlement, the difference between the Company's requested revenue increase and the Commission approved revenue increase was first used to eliminate the Rate IGS subsidies. The remaining amount was then applied to all rate classes, including Rate IGS.

Q. Why is it appropriate, from a regulatory policy perspective, to focus the subsidy reductions on large industrial rate classes?

A. There are a number of reasons to focus on the subsidies paid by large industrial customers. Electric rates are a significant factor in the competitiveness of manufacturers that must compete regionally, nationally, and internationally. It is important to recognize the impact of increasing electric rates on the ability of large manufacturing customers to continue to operate and to attract new, higher paying manufacturing businesses.

While moving all rates towards cost of service can be an appropriate regulatory policy, it is not the only factor. First, there can be legitimate disagreements on the appropriate methodology that should be used to allocate costs to rate classes. Moreover, such factors as gradualism, state economic development goals, the impact on competitiveness of industry, and other policy factors should also be considered by the Commission.

Q. Would you elaborate further on the non-cost of service factors that should be considered in assigning the overall increase to rate classes?

A. The non-cost of service factors can be categorized into two groups: rate shock/gradualism and competitiveness issues. Gradualism recognizes that that there are reasonable limits to how high a rate class's rates can be increased, regardless of the results of a cost of service study. This is especially important in areas where there is currently significant economic hardship due to general economic conditions.

Q. Does Kentucky law support the consideration of non-cost factors like economic development when allocating utility costs among the customer classes?

A. Yes, while not offering a legal opinion or interpretation, from a non-lawyer perspective, KRS 278.030(3) provides such support. KRS 278.030(3) specifically states that utilities may take into account the "nature" and "purpose" for which utility service is used when setting rates and classifications of service. That Section, entitled Rates, classifications and service of utilities to be just and reasonable states:

> Every utility may employ in the conduct of its business suitable and reasonable classifications of its service, patrons and rates. The classifications may, in any proper case, take into account <u>the nature of the use</u>, the quality used, the quantity used, the time when used, <u>the purpose for which used</u>, and any other reasonable consideration. (emphasis added)

The Kentucky General Assembly has not specifically made cost of service a criterion in setting rates. In fact, cost of service is not mentioned in the relevant statutes. But the General Assembly has specifically authorized the consideration of non-cost factors when setting rates, establishing that the "purpose" for which a customer uses power and the "nature" of use may justify different rate treatment. Given this language it would be appropriate for the Commission to consider economic development principles when determining a just and reasonable rate allocation in this case.

Energy-intensive large manufacturing customers use a relatively large amount of power in order to convert raw materials into a finished product. Such processes rely on electric power as an input into the manufacturing process. Industrial customers that compete in regional, national and international markets are greatly affected by increases in the price of power. Many industrial manufacturers located in Kentucky precisely because of historically low electric rates. But because Kentucky's generation mix is so heavily reliant on coal, that competitive advantage could easily turn into a disadvantage as stricter environmental regulations develop.

In contrast, commercial customers primarily use electricity for lighting and cooling. These uses typically represent a relatively small portion of that customers' total expenses. Additionally, a commercial customer in Kentucky faces its primary competition from other local retailers in the same electric service territory. An increase or decrease in power rates will not confer an advantage or disadvantage on any single competitor because they are all served by the same utility at presumably the same rate.

Q. Is a consideration of the nature and purpose of electric power use, rather than pure cost-of-service, a concept that is found in the Companies' tariffs?

A. Yes. According to the Companies' tariffs, customers are considered "industrial" if "they are engaged in activities primarily using electricity in a process or processes involving either the extraction of raw materials from the earth or a change of raw or unfinished materials into another form or product." Customers considered to be "energy intensive" must be served only under "Rates RTS, FLS or TODP".

The Companies' tariffs under Classification of Customers also makes a clear distinction between "industrial" and "commercial" customers. The Companies' tariffs state:

> For purposes of rate application hereunder, non-residential Customers will be considered "industrial" if they are primarily engaged in a process or processes which create or change raw or unfinished materials into another form or product, and/or in accordance with the North American Industry Classification System, Sections 21, 22, 31, 32 and 33. All other non-residential Customers will be defined as "commercial."[2]

Consistent with KRS 278.030(3) and the Companies' tariffs, when allocating costs and setting rates the Commission should consider the "nature" of industrial use and the "purpose for which" industrial customers use power.

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[2] LG&E Electric No. 13, Original Sheet No. 101.2 ; KU No. 20, Original Sheet No. 101.2.

Q. Do industrial manufacturers provide significantly more economic development benefits to the state and local economies than commercial or service sector customers?

A. Yes. Manufacturing industries provide a pivotal role in driving economic growth, job creation, productivity, and regional development. Manufacturing acts as an "engine of growth" by generating externalities, fostering innovation, and creating multiplier effects that bring new dollars into local economies through exports and supply chain linkages. Unlike commercial or service sectors, which often recirculate local funds, manufacturing tends to attract external revenue, support higher-wage jobs, and spill over benefits to adjacent industries. For example, Toyota has approximately 200 Kentucky-based suppliers to its Georgetown plant.

Q. Does the Kentucky Cabinet for Economic Development offer incentives for new manufacturers to locate in Kentucky, but not for commercial businesses?

A. Yes. Team Kentucky offers a wide range of financial incentives for new manufacturers to locate in Kentucky. These incentives are not available to businesses generally regarded as serving the local market. I believe that this reflects a recognition of the importance of industrial manufacturers that export products and import dollars.

Q. How many people are directly employed by Kentucky manufacturers?

A. According to the National Association of Manufacturers, manufacturing in Kentucky directly employs 260,600 workers.[3] This is 12.7% of the total workforce, which is the sixth highest percentage nationally. Average annual earnings for manufacturing employees in Kentucky are 44.2% higher than the non-farm average.

Q. Does Governor Beshear recognize the importance of maintaining and growing Kentucky's manufacturing base?

A. Yes. Governor Beshear has frequently emphasized the role of industry and manufacturing in driving Kentucky's economic growth, job creation, and overall prosperity.

> "Kentucky manufacturing is booming. With 25,300 new full-time jobs through over $18 billion in investments announced since I took office, this industry is making us a national leader while also helping our Kentucky families live the lives they want and deserve."[4]

> "Each company that chooses to locate a new project here in the Commonwealth brings with them quality jobs and opportunities for our

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[3] https://nam.org/mfgdata/regions/kentucky/
[4] https://x.com/GovAndyBeshear/status/1608243396988096512

families. Our manufacturing industry continues to grow because these great companies see what Team Kentucky has to offer."[5]

"Kentucky's manufacturing industry is – literally – building a better and brighter future for our Commonwealth."[6]

Q. Does Senate President Stivers share the Governor's opinion regarding the importance of manufacturing?

A. Yes. He has stated as follows:

"When you look at the breadth of Kentucky's manufacturing sector and its recent growth, it's clear the Commonwealth offers some of the country's most compelling advantages."

"This is a special day in Kentucky as we celebrate another major investment in our people and our workforce. The General Assembly has worked to foster a pro-business environment in Kentucky, making us an attractive destination for global companies. We'll continue this work, alongside Gov.

[5] https://x.com/GovAndyBeshear/status/1835086121451372776
[6] https://x.com/GovAndyBeshear/status/1750694697511580022

Beshear, to keep bringing opportunity to our citizens." (comments on a $712 million battery manufacturing project creating over 1,500 jobs.)[7]

Q. Is it the policy of the Kentucky Legislature to support new and expanding industries through adequate supplies of electricity?

A. Yes. Pursuant to KRS 164.2807, the General Assembly finds and declares that: "(1). . . (d) The current economy and future economic development of the Commonwealth requires reliable, resilient, dependable, and abundant supplies of electrical power; . . . (o) Local economic development requires an adequate supply of electricity to support new and expanding industries and is enhanced by robust employment in coal mining and coal transportation and at electrical generating facilities, the local job multiplier effect of employment in the coal, natural gas, and electric generating industries, and state and local taxes and other forms of economic value creation for the Commonwealth."

Q. Does Kentucky have a more energy intensive economy than the U.S. in general and competitor states due to its large manufacturing base?

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[7] https://newkentuckyhome.ky.gov/Newsroom/NewsPage/20241115_ShelbyvilleBatteryManufacturing

A. Yes. According to the 2025 Kentucky Annual Economic Report prepared by the U.K Gatton College of Business and Economics, Kentucky has a much more energy intensive economy than the U.S. in general and competitor states. The report states as follows:

> "Kentucky has an energy intensive economy. To generate $1 in state gross domestic product, Kentucky consumes about 6,400 Btu (2022). By comparison, the U.S. average is around 3,600 Btu and the competitor state average is 4,300 Btu. This difference is driven, in part, by Kentucky's larger than average manufacturing sector, which, of course, depends greatly upon energy as a production input. One implication of this higher dependence on energy as an economic input is that, compared to most of the competitor states, Kentucky's economy is more sensitive to energy prices."[8]

Q. Does the same Report warn that industrial electric rates in Kentucky have risen much faster in recent years than competitor states thus threatening Kentucky's comparative economic advantage?

A. Yes. The 2025 Kentucky Annual Economic Report determined that since 1997 industrial electric rates in Kentucky have risen by 134% compared to about 80% for competitor states and the U.S. in general. This threatens Kentucky's

[8] Kentucky Annual Economic Report 2025 p. 158.

competitive advantage. The Report stated, as follows, about the impact of high electric rates to Kentucky manufacturers:

> "Frequently cited as an important factor to recruit new industries to Kentucky as well as keep existing industries competitive, electricity prices here are consistently below the U.S. and competitor state averages. Kentucky's industrial rates are lower because of an abundance of coal and coal-fired power plants in the state and region. However, the average retail price of electricity to industrial customers increased in Kentucky by 134 percent from its nadir of 2.8 cents in 1997 to 6.6 cents in 2023 (current dollars). As prices have increased so too have the worries that Kentucky is losing its comparative advantage in low-cost utility rates; price increases for the U.S. and competitor states during the same time period (from 1997 to 2023) have been about 80 percent."[9]

Q. What is your specific recommendation to address the rate class subsidies paid by the Companies' large industrial and manufacturing customers?

A. As I showed in Table 1 for LG&E, customers on Rate Schedules TODP and RTS will be paying annual subsidies of $10.4 million and $4.9 million at proposed rates, based on the Company's proposed apportionment of the revenue increase. For KU (Table 2), the 6 CP cost of service study shows that customers on large industrial rate

[9] *Ibid.*

schedules TODP, RTS and FLS will be paying subsidies of $35.4 million, $14.3 million and $2.7 million annually at proposed rates. My recommendation is to reduce this level of current subsidies by 50% at proposed rates using a portion of the revenue requirement reduction authorized by the Commission in its decision in these cases. The remainder of any Commission authorized reduction from the level of the Companies' filed requested increases should be applied on a uniform basis to each rate class, including Rates TODP, RTS and FLS.

Q. Can you provide an illustration of how your proposal would work?

A. Table 5 contains an illustration for LG&E. LG&E filed for an overall retail revenue increase of $105.04 million. Assuming, for illustration purposes, that the Commission authorized an increase of $85.04 million (a reduction of $20 million), $7.68 million would be used to reduce the proposed subsidies paid by customers on Rates TODP and RTS by 50%. The remaining amount of the Commission reduction ($12.3 million) would be applied on a uniform percentage basis to reduce the revenue increases to all rate schedules.

Table 5
Illustration of Subsidy Reduction for LG&E Rates PTOD, RTS
Based on Assumed Commission Revenue Requirement Reduction of $20 Million

	Present Revenues	Proposed Increase	Percent	Large Industrial Subsidy*	50.0% Subsidy Reduction	Remaining Revenue Reduction	Revenue Increase	Percent
RS	510,989,021	52,779,084	10.3%			(6,677,602)	46,101,483	9.0%
GS	172,472,836	11,651,506	6.8%			(1,474,147)	10,177,360	5.9%
PS-Sec	148,430,855	10,291,992	6.9%			(1,302,141)	8,989,851	6.1%
PS-Pri	6,429,829	416,855	6.5%			(52,740)	364,114	5.7%
TOD-Sec	129,996,561	9,736,327	7.5%			(1,231,839)	8,504,489	6.5%
TOD-Pri	152,375,560	11,963,995	7.9%	(10,434,075)	(5,217,037)	(853,624)	5,893,334	3.9%
RTS - Trans.	68,267,256	5,331,532	7.8%	(4,931,850)	(2,465,925)	(362,556)	2,503,051	3.7%
SCC	4,534,484	415,817	9.2%			(52,609)	363,208	8.0%
LS & RLS	23,947,842	2,251,233	9.4%			(284,826)	1,966,408	8.2%
LE	369,589	24,684	6.7%			(3,123)	21,561	5.8%
TE	366,305	27,729	7.6%			(3,508)	24,221	6.6%
OSL	14,321	6	0.0%			(1)	6	0.0%
EV	55,251	7,375	13.3%			(933)	6,442	11.7%
SSP	265,394	134,719	50.8%			(17,045)	117,674	44.3%
BS	8,765	2,717	31.0%			(344)	2,374	27.1%
Total	1,218,523,867	105,035,574	8.6%	(15,365,925)	(7,682,962)	(12,317,038)	85,035,574	7.0%

* Subsidy at LG&E proposed revenue increase.

Table 6 illustrates my recommendation for KU. KU filed for an overall revenue increase of $226.3 million. Assuming, for illustration purposes that the Commission approves a revenue increase for KU of $176.3 million, a portion of the $50 million reduction would be used to reduce the subsidies paid by KU rate Schedules TODP, RTS and FLS by $12 million (a 50% reduction in KU's proposed subsidies for these rate schedules), with the remaining $38 million applied on a uniform percentage basis to all KU rate schedules.

Table 6
Illustration of Subsidy Reduction for KU Rates PTOD, RTS, FLS
Based on Assumed Commission Revenue Requirement Reduction of $50 Million

	Present Revenues	Proposed Increase	Percent	Large Industrial Subsidy*	50.0% Subsidy Reduction	Remaining Revenue Reduction	Revenue Increase	Percent
RS	741,466,479	104,186,935	14.1%			(18,468,070)	85,718,866	11.6%
GS	272,241,062	26,744,962	9.8%			(4,740,785)	22,004,178	8.1%
AES	13,171,291	1,519,896	11.5%			(269,415)	1,250,481	9.5%
PS-Sec	179,971,469	17,648,181	9.8%			(3,128,299)	14,519,883	8.1%
PS-Pri	10,183,697	995,692	9.8%			(176,495)	819,197	8.0%
TOD-Sec	163,839,995	18,780,068	11.5%			(3,328,936)	15,451,132	9.4%
TOD-Pri	308,400,771	35,383,292	11.5%	(17,579,420)	(8,789,710)	(4,713,951)	21,879,631	7.1%
RTS - Trans.	122,988,078	14,267,780	11.6%	(5,595,931)	(2,797,966)	(2,033,128)	9,436,687	7.7%
FLS - Trans.	23,206,906	2,715,057	11.7%	(850,366)	(425,183)	(405,901)	1,883,974	8.1%
LS & RLS	31,822,538	3,808,994	12.0%			(675,178)	3,133,815	9.8%
LE	382,365	44,729	11.7%			(7,929)	36,800	9.6%
TE	252,098	27,692	11.0%			(4,909)	22,784	9.0%
OSL	94,429	484	0.5%			(86)	398	0.4%
EV	45,249	5,093	11.3%			(903)	4,190	9.3%
SSP	189,766	181,347	95.6%			(32,145)	149,202	78.6%
BS	53,798	5,716	10.6%			(1,013)	4,703	8.7%
Total	1,868,309,993	226,315,920	12.1%	(24,025,717)	(12,012,858)	(37,987,142)	176,315,920	9.4%

* Subsidy at KU proposed revenue increase.

III. RATE DESIGN ISSUES

<u>A. Residential Electric and Gas Customer Charge Issues</u>

Q. Have you reviewed the Companies' proposed rate design for residential electric and residential gas customer charges for LG&E and the proposed residential electric customer charge for KU?

A. Yes. Table 7, below, provides a comparison of LG&E's present and proposed residential electric and gas customer charges. Also shown are the average total residential class electric and gas increases proposed by LG&E in this case.

Table 7
LG&E Proposed Residential Electric and Gas Customer Charge Increases
Basic Service Charge, Daily

	Present	Proposed	Daily Charge Increase	Present Monthly Equivalent Charge	Proposed Monthly Equivalent Charge	Monthly Equivalent Charge Increase	Percent Increase
Electric							
BSC	$ 0.45	$ 0.52	$ 0.07	$ 13.69	$ 15.82	$ 2.13	15.6%
Residential Class							10.3%
LG&E Retail							8.6%
Gas							
BSC	$ 0.65	$0.81	$ 0.16	$ 19.77	$ 24.64	$ 4.87	24.6%
Residential Class							23.9%
LG&E Retail							23.2%

As can be seen, LG&E is proposing to increase the monthly customer charges for electric customers substantially more, on a percentage basis, than for the residential class as a whole. For the residential gas customer service charge, the increase is about the same as it is for the residential class as a whole. Notwithstanding this, the gas customer charge increase, which impacts residential gas customers regardless of their level of monthly gas usage, is significant (a 25% increase).

Q. What is the basis for LG&E's greater than average proposed increase to the residential electric customer charges?

A. Based on the testimony of LG&E witness Michael Hornung, the driving force for these increase is the unit cost of service study results. Mr. Hornung argues that the Company's residential customer costs are substantially greater than the current level of the electric customer charges. Notably, for LG&E's residential gas rate, the proposed basic customer charge is almost the same as the customer charge unit cost from the Company's cost of service study.

Q. Do you disagree with the Company's customer cost analyses for electric and gas residential service?

A. No. I have reviewed the Company's analyses and have not identified any specific problems with the customer cost studies. However, as the Company itself has recognized, for rate design purposes, the cost study is only the starting point for determining a just and reasonable rate design. In particular, for residential customers, it is important to examine the impact of the rate design and determine whether the proposal is consistent with gradualism.

Q. Is KU's proposed residential electric customer charge being increased in a similar manner to LG&E's?

A. Yes. While the rates are different, the Company is proposing to increase the residential customer charge by 1.5 times the average KU residential class percentage increase. Table 8 shows a comparison of the present and proposed KU residential customer charges, as well as the percentage increase for the entire residential rate class. The customer charge will increase by 20.8%, compared to an overall 14.1% increase for the residential class as a whole under KU's proposed rates.

Table 8
KU Proposed Residential Electric Customer Charge Increase
Basic Service Charge, Daily

	Present	Proposed	Daily Charge Increase	Present Monthly Equivalent Charge	Proposed Monthly Equivalent Charge	Monthly Equivalent Charge Increase	Percent Increase
BSC	$ 0.53	$ 0.64	$ 0.11	$ 16.12	$ 19.47	$ 3.35	20.8%
Residential Class							14.1%
LG&E Retail							12.1%

Q. Have you drawn any conclusions regarding LG&E's electric and gas customer charge increase proposals, and KU's residential electric customer charge increase proposal?

A. Yes. While the Companies' proposed customer charge increases are substantial for their respective electric customers, the proposed charges would still be significantly below their respective unit costs. Table 9 summarizes the LG&E and KU proposed residential customer charges compared to the customer cost of service developed in the Companies' cost of service studies.

Table 9
LG&E Proposed Residential Electric and Gas Customer Charges and
KU Residential Electric Charges Vs. Unit Cost of Service

	Present	Proposed	Daily Charge Increase	Present Monthly Equivalent Charge	Proposed Monthly Equivalent Charge	Basic Customer Charge Unit Cost of Service	Proposed Rate as a % of Unit Cost
LG&E Electric							
BSC	$ 0.45	$ 0.52	$ 0.07	$ 13.69	$ 15.82	$ 23.85	66.3%
LG&E Gas							
BSC	$ 0.65	$0.81	$ 0.16	$ 19.77	$ 24.64	$ 25.04	98.4%
KU Electric							
BSC	$ 0.53	$ 0.64	$ 0.11	$ 16.12	$ 19.47	$ 28.38	68.6%

As can be seen, the proposed customer charges would continue to be below cost, even with the Companies' larger than average increases.

Q. What is your recommendation to the Commission on this issue?

A. Based on my review and analyses, I recommend that the Companies' proposed electric and gas residential customer charges be accepted, as filed. However, to the extent that the Commission authorizes a revenue increase to the LG&E and KU residential electric rate classes, and the LG&E residential gas rate class that is lower than the Companies' requested revenue increases for LG&E's residential electric and gas rate classes, and KU's residential electric rate class, a portion of the Commission adjustment should first be applied to the respective customer charges of these rates to reduce the percentage increases to the level of the overall rate class increase. For example, if the Commission authorizes a 10% increase to KU's residential rate class (vs. the 14.1% requested by KU), the KU residential customer charge increase should be reduced to 10%, before reducing the commodity portion of the rate.

B. TODP and RTS Rate Design

Q. Have you reviewed the Companies' proposed rate design for Rates TODP and RTS?

A. Yes. The Companies are proposing substantial increases in the energy charges of all four large customer rates, and demand charge decreases for three of the four rates. Tables 10 and 11 below summarize the proposed increases and decreases in the TODP and RTS energy and demand charges. The TODP energy charges for LG&E and KU are being increased by about 20% and 25% respectively, compared to the proposed overall increase for these rates of 7.9% and 11.5%. LG&E is proposing to increase its RTS energy charge by 19%, compared to an overall RTS increase of 7.8%; KU is proposing an RTS energy charge increase of 25% vs. an overall increase of 11.6% for Rate RTS. In both cases, the Companies are proposing TODP and RTS energy charge increases that are more than twice the proposed increases for the rates, overall. The Companies' proposals substantially disrupt the current balance among high and low load factor customers on these rates. A high load factor customer, that is energy intensive, compared to an average TODP and RTS customer, will receive a disproportionately larger rate increase as a result of the Companies' rate design proposal.

Table 10
Companies' Proposed TODP Increases

	Current	Proposed	% Change
LG&E			
Energy Charge	0.03174	0.03797	19.6%
Demand kVA Base	2.45	2.45	0.0%
Demand kVA Intermediate	7.74	7.69	-0.6%
Demand kVA Peak	10.03	9.94	-0.9%
KU			
Energy Charge	0.03026	0.03771	24.6%
Demand kVA Base	2.79	2.86	2.5%
Demand kVA Intermediate	7.78	7.94	2.1%
Demand kVA Peak	9.60	9.81	2.2%

Table 11 Companies' Proposed RTS Increases			
	Current	Proposed	% Change
LG&E			
Energy Charge	0.03137	0.03721	18.6%
Demand kVA Base	1.93	1.93	0.0%
Demand kVA Intermediate	7.41	7.19	-3.0%
Demand kVA Peak	9.59	9.32	-2.8%
KU			
Energy Charge	0.02966	0.03692	24.5%
Demand kVA Base	2.16	2.16	0.0%
Demand kVA Intermediate	7.55	7.54	-0.1%
Demand kVA Peak	9.31	9.3	-0.1%

Q. How do the Companies justify the very large energy charge increases for these large industrial customer rates?

A. It appears that the Companies are proposing to increase the TODP and RTS energy charges to 100% of long-term unit energy cost including maintenance and cash working capital. Baron Exhibit SJB-2 shows the development of each Companies' TODP and RTS long term unit cost of service energy charges, based on the Companies' filed class cost of service studies. These long-term unit energy costs are identical to the energy charges shown in Tables 10 and 11 above.

Q. Is the Companies' justification reasonable?

A. No. There is a difference between long-term energy costs used to allocate costs among rate schedules, versus variable energy costs used for system dispatch. The Companies' long-term unit cost of service studies assigns maintenance and cash working capital costs to the TODP and RTS energy function that do not reflect the Companies' variable production costs in dispatching the system for increases or decreases in energy usage.

Q. Are you objecting to the Companies' functional and class cost of service study results that form the basis for the TODP and RTS unit energy costs?

A. No, not for class cost of service purposes. The Companies have followed a traditional production cost classification approach in their cost of service study that classifies a portion of long-term production O&M maintenance expenses and cash working capital as energy related, in addition to fuel expenses, purchased power energy costs and certain production related variable O&M expenses that are directly related to energy generation. The cost studies classify a portion of cash working capital rate base that is associated with energy related expenses (primarily fuel) as energy related. I don't disagree with this treatment in the class cost of service studies. However, I don't believe that it is appropriate or economically efficient to include these maintenance costs and rate base costs in the energy charges themselves. These are long-term energy related costs, not variable energy costs. From an economic standpoint, customers should receive price signals in their rates that better represent the variable costs of consuming an additional kWh. While over a longer-term period it could be argued that additional energy usage will lead to a higher level of maintenance and cash working capital, large industrial customers on Rates TODP and RTS should make consumption decisions based on a price signal that reflects the variable costs that will be incurred to serve that additional energy usage.

Q. Have you performed an analysis of the Companies' unit cost of service studies to determine the unit variable energy cost for Rates TODP and RTS based on only fuel, purchased power energy, and variable production O&M costs?

A. Yes. Tables 12 and 13 below show these results for each Company.

Table 12
LG&E - Adjusted Unit Energy Cost

	TODP	RTS
Total Energy O&M	74,471,877	39,160,209
Less Energy-Related Non-Fuel O&M	(12,188,334)	(6,412,989)
Less Energy-Related Base Revenue Req.	(1,477,042)	(753,394)
Plus Steam Expenses	2,693,369	1,417,138
Plus Water for Power	7,504	3,949
Adjusted Energy Related Cost of Service	63,507,374	33,414,911
Billing Units	1,961,477,530	1,052,483,619
Adjusted Unit Energy Cost	0.032377	0.031749

Table 13 KU - Adjusted Unit Energy Cost (Excludes Energy-Related Non-Fuel O&M, Rate Base)		
	TODP	RTS
Total Energy O&M	149,440,952	68,725,927
Less Energy-Related Non-Fuel O&M	(22,673,556)	(10,432,976)
Less Energy-Related Base Revenue Req.	(2,172,720)	(962,146)
Plus Steam Expenses	3,243,579	1,492,496
Plus Water for Power	-	-
Adjusted Energy Related Cost of Service	127,838,255	58,823,301
Billing Units	3,962,655,520	1,861,580,355
Adjusted Unit Energy Cost	0.032261	0.031599

Q. Are you recommending that the TODP and RTS energy charges be set at the variable production levels shown in Tables 12 and 13?

A. Yes. The proposed TODP and RTS demand charges should be increased on a revenue neutral basis to account for the revenue loss from the lower energy charges. Smaller energy charge increases coupled with demand charge increases (not decreases) is more consistent with gradualism and better maintains rate continuity. Tables 14 and 15 show the TODP and RTS energy charges that I am recommending for LG&E and KU.

Table 14
Recommended TODP Energy Charges using Adjusted Unit Cost

	Current	AG/KIUC Proposed	% Change
LG&E			
Energy Charge	0.03174	0.032377	2.0%
KU			
Energy Charge	0.03026	0.032261	6.6%

Table 15
Recommended RTS Energy Charges using Adjusted Unit Cost

	Current	AG/KIUC Proposed	% Change
LG&E			
Energy Charge	0.03137	0.031749	1.2%
KU			
Energy Charge	0.02966	0.031599	6.5%

Q. To the extent that the Commission reduces the revenue increase to LG&E's and KU's Rates TODP and RTS, do you recommend that the revenue adjustment be applied to both the energy charge that you are recommending in Tables 14 and 15, as well as the adjusted demand charges?

A. Yes. First, the Companies' proposed TODP and RTS rates should be revised on a revenue neutral basis to incorporate the recommended energy charges shown in

Tables 14 and 15. In order to maintain revenue neutrality, this will also require an increase in the Companies' proposed TODP and RTS demand charges. Assuming that the Commission reduces the Companies' overall revenue increases in these cases, the reductions for Rates TODP and RTS should be applied uniformly to the adjusted energy and demand charges. This would be particularly important if the Commission adopts my proposal to reduce the proposed subsidies for Rates TODP and RTS.

Q. Would your TODP and RTS rate design proposal have any impact on any other LG&E or KU rate class?

A. No. This rate design change would only affect Rates TODP and RTS. It would not impact any other rate class.

IV. CURTAILABLE SERVICE RIDER ("CSR") ISSUES

Q. Please describe the KU/LG&E CSR program.

A. The Curtailable Service Rider program pays CSR customers a demand credit for agreeing to reduce their usage to pre-determined firm service levels during system emergencies. CSR customers are also given the option to pay higher energy rates than standard customers for specified hours to avoid physical interruptions (buy-through option).

Q. What are the basic terms of the CSR program?

A. The Companies have two programs, CSR-1 and CSR-2. Most customers take service under CSR-2. The basic terms of each CSR program include: 1) maximum daily and yearly curtailment hours; 2) notice time for curtailment; 3) emergency conditions when physical curtailments are required; 4) times when the customer can buy-through a non-emergency curtailment by paying a higher energy charge; 5) buy-through pricing; 6) penalties for non-compliance; and 7) demand credits.

Q. How does the CSR program benefit the system?

A. Load reductions available from the CSR program are modeled as generation resources in system planning. This reduces the amount of generation (plus the associated reserve margin) that the Companies would otherwise need to build. For example, in the current CPCN (Case No. 2024-00045), the Companies counted their CSR as a 110 MW resource in the summer and a 115 MW resource in the winter. The Companies' reserve margin in the winter is 29% and 23% in the summer. CSR customers also reduce system energy costs, as I will discuss subsequently.

Q. Has the Commission recently recognized the value of the CSR program?

A. Yes. In Case No. 2023-00422 the Commission investigated the limited blackouts caused by Winter Storm Elliott in December 2022. The CSR program, through the interruption of load for a full 27 hour period, prevented the problem from being exacerbated. The Commission recommended that an expansion of the CSR program be evaluated and that the effectiveness of the penalty be studied. The Commission concluded:

> "Having reviewed the record and being otherwise sufficiently advised, the Commission finds that LG&E/KU's CSR tariffs largely acted as intended, allowing for a reduction of 130 MW during Winter Storm Elliott. LG&E/KU appropriately penalized the out-of-compliance customers and reminded the customers of their obligations pursuant to the tariff for service. Ultimately, the out of compliance customers were only short approximately 1.2 mVA on December 23, 2022. The Commission recommends that LG&E/KU continue to evaluate the expansion of their CSR programs and whether the current penalty for non-compliance is an effective deterrent. The Commission will further explore evaluation of the CSR tariff and other tariffs in LG&E/KU's 2024 IRP and future rate case filings." January 7, 2025 Order at 43-44.

Q. Have there been more recent emergency events when physical curtailments were required?

A. Yes. On Tuesday June 24, 2025, CSR customers were required to physically shed load for approximately six hours to maintain system reliability.

Q. Are physical curtailments likely to be more common in the future?

A. In my opinion, yes. Data center load growth and the lack of new dispatchable generation being built in many neighboring areas make physical curtailments even in the Companies' service territories more likely.

Q. Please describe the history of the CSR program.

A. KU and LG&E have had identical CSR programs since at least 2009. The terms and conditions have evolved many times since then. In 2009, CSR 1 was comparable to the current CSR 2. Table 16, below, compares the basic terms of the 2009 CSR-1 with the current 2025 CSR-2.

Table 16 CSR-1 and CSR-2 Rate Summary		
	2009 CSR-1	**2025 CSR-2**
Maximum Annual And Daily Curtailable Hours	200 Annual Hours 14 Hours Per Day	375 Annual Hours 14 Hours Per Day
Notice	Twenty Minutes	For Buy-Through Events, 10 minutes to elect physical curtailment and an additional 30 minutes to curtail. Absent an election, customer is assumed to have elected buy-through. For Physical Events, forty minutes to physically curtail load.
Physical Curtailments Required	When Market Power Not Available	All Available Units Are Dispatched 100 Hours Per Year
Buy-Through Option	Available For All Hours When Market Power Is Available	275 Hours Per Year
Buy-Through Pricing	Market	Formula Rate Based On Combustion Turbine Gas Cost
Penalties For Non-Compliance	$16 Per KW	$16 Per KVA
Demand Credits	$5.20 Per KW Primary $5.10 Per KW Transmission	$6.00 Per KVA Primary $5.90 Per KVA Transmission

Q. Would it be rasonable to increase the CSR demand credits in this case?

A. Yes. The CSR demand credits have increased by less than $1 over the past 16 years. That is less than 20%. But since 2009 the value of generating capacity has risen dramatically. And as I explained earlier, physical curtailements like those that occurred during Winter Storm Elliott in December 2022 and the June 2024 heat dome are more likely in the future given structural supply-demand imbalances in the region. The CSR program is an important reliability resource. CSR customers are currently being undercompensated.

Q. How were the current CSR credits developed?

A. Based on the Companies' responses to AG/KIUC Initial Request for Information, Q-110, the "current CSR-1 rate was develped as part of the 2016 Rate Case and its support can be found in the attached file. The current CSR-2 rate was agreed to separately as part of the Stipulation Agreement filed in the 2016 Rate Case on April 19, 2017."

Q. Have you reviewed the Companies' testimony on CSR in the 2016 Rate Case?

A. Yes. Companies' witness Steven Seelye presented the testimony and explained the Companies' approach to calculating avoided capacity cost for use in developing the CSR credit. Beinning on page 50 of his testimony, he discusses the basis for the Companies' valuation of CSR load.[10]

> **Q. What is the basis for the proposed credit?**
> A. As also discussed in the Direct Testimony of David S. Sinclair, KU is proposing to determine the credit based on the fixed carrying costs of the large-frame combustion turbines jointly owned by KU. Specifically, the credit is 1 based on Brown Units 8, 9, 2 10, and 11, which are wholly owned by KU, and on KU's portion of the fixed costs of the jointly-owned Brown Units 5, 6, and 7, Trimble County Units 5, 6, 7, 8, 9, and 10, and Paddy's Run Unit 13. These units were installed during the late 1990s and early 2000s. It is appropriate to use the fixed carrying costs of these combustion turbine units because these units would be dispatchable for a similar number

[10] Direct Testimony of Steven Seelye, Case No. 2016-00370, pages 50-52.

of hours as the hours of curtailment set forth in the CSR tariff. These units are typically dispatched after KU and LG&E's base load coal-fired steam units, gas-fired combined cycle facility, solar generation facility, and hydro-electric units. Traditionally, load designated to be served under CSR has been used to avoid or defer the installation of peaking units such as combustion turbines which have been dispatched fewer hours of the year than coal-fired steam generating units or gas-fired combined cycle generating units. In the past, the CSR credit has been based on the avoidance or deferral of a hypothetical combustion turbine unit. The Companies currently expect they will have no need to install peaking or other generation capacity through the end of the forecasted test year. Therefore, instead of using the cost of a hypothetical future combustion turbine unit that may or may not be installed during the next decade or more to establish the credit, the Company is proposing to use the fixed carrying costs of the most-recently installed conventional combustion turbines as the basis for the CSR credits.

Q. What do you mean by a "conventional combustion turbine"?
A. A conventional combustion turbine, as opposed to a combined-cycle combustion turbine, is a single cycle turbine for which there is no heat-recovery system that allows heat from the combustion gas to be reused to operate at higher efficiencies. Combined-cycle units have higher fixed costs but operate at greater capability and higher efficiencies, which allows the units to be operated for more hours during the year. KU's combined cycle unit will typically operate for more than 8,000 hours during the year. The operational hours of a combined cycle generating unit or of a coal-fired steam generating unit are in no way comparable to the hours of curtailment set forth in the CSR tariff.

Q. Have you developed an updated curtailable credit based on the current expected cost of combustion turbine capacity?

A. Yes. Using the Companies' recent information provided in its pending CPCN case (Case No. 2025-00045), I have developed an estimate of the current cost of a combustion turbine that would be an appropriate basis to use in the development of a CSR credit. The analysis is based on the Confidential Attachment provided by the Companies in response to AG/KIUC Question 1-31 in the current cases.

The avoided cost calculation is based on the levelized cost of a 2028, 258 MW (winter rating) SCCT, plus a reserve margin adjustment. The reserve margin adjustment recognizes that, for example, 100 MW of CSR load would actually avoid 129 MW of generating capacity based on the Companies' winter reserve margin criterion.

Table 17
Calculation of CSR Avoided Capacity Rate
Based on a 2028 Simple Cycle Combustion Turbine

Revenue Requirement	36,726,075
Winter MW	258
Summer MW	243
Winter Reserve Margin (RM)	29%
Winter MW Load Served*	200
Fixed Rev. Req/Winter kW-Year	183.63
Avoided Capacity Cost - $/kW-Month	**15.30**

* SCCT Capacity adjusted for RM

Q. Why is it appropriate to adjust the avoided capacity cost for the winter and summer reserve margins in the determination of an appropriate CSR capacity credit?

A. Based on the Companies' current planning criteria, LG&E/KU require a winter reserve margin of 29% applied to load and summer reserve margin of 23%. All else being equal, if a 10 MW CSR load is treated as firm load, it would require 12.9

MW of generating resources in the winter and 12.3 MW of resources in the summer. To properly reflect this in the CSR credit, the avoided capacity cost must be adjusted upward by the reserve margin.

Q. Are there additional benefits provided by CSR customers in the form of energy savings to LG&E and KU firm customers?

A. Yes. This occurs when CSR load is interrupted, and when CSR customers are permitted to buy-through curtailments during periods of high energy pricing. The buy-through acts as an energy hedge for other customers. All else being equal, when a physical CSR curtailment occurs, the system does not have to generate or purchase energy for the CSR load that is curtailed. Absent the ability to curtail the load, LG&E and KU would otherwise have to serve the load, likely resulting in higher energy costs for all customers. Physical curtailments can be invoked by the Companies for up to 100 hours per year. For another 275 hours per year, the Companies can require CSR customers to either curtail physically, or to buy-through the curtailment and pay the designated incremental energy cost. Either way, the system saves the incremental cost of energy that would otherwise be incurred to serve the CSR load if it were not subject to curtailment or buy-through.

Q. Have you been able to quantify the value of the energy cost savings to firm customers made possible by CSR curtailments?

A. Yes. I have analyzed the avoided energy costs to the LG&E and KU systems as a result of CSR customers buying-through curtailments. To the extent that these CSR customers were firm customers and not subject to curtailments, LG&E and KU would incur additional energy costs based on the system incremental costs (marginal cost). In response to AG/KIUC Supplemental discovery, Question 52, the Companies provided data that permitted an analysis of the energy benefit produced during buy-through events. For the years 2022 and 2024 and the first few months of 2025, the KU and LG&E systems saved $1.7 million and $216,000, respectively, in energy costs that would otherwise be incurred if the CSR customers were not curtailed or required to buy-through the curtailment. The total LG&E/KU energy savings during this period was $1.9 million. Table 18, below, summarizes the results.

While I am not recommending that these energy savings be included in the CSR credits, the results of Table 18 demonstrate that the CSR program provides benefits to the Companies' firm power customers well above the current level of the credits.

Table 18
Summary of CSR Avoided Energy Benefits

		By-Thru Price	Marginal Cost
KU		By-Thru Price	Marginal Cost
	2025*	$694,317	$657,168
	2024	$280,946	$49,127
	2022	$1,202,930	$973,067
Total		$2,178,193	$1,679,362
LGE		By-Thru Price	Marginal Cost
	2025*	$64,992	$62,634
	2024	$0	$0
	2022	$184,672	$153,381
Total		$249,664	$216,015
Total		**By-Thru Price**	**Marginal Cost**
	2025*	$759,309	$719,802
	2024	$280,946	$49,127
	2022	$1,387,602	$1,126,448
Total		$2,427,857	$1,895,377

* 1/1/2025 to 2/21/2025

Q. Are you recommending that the CSR credits be increased to the full $15.30/kW month value of avoided capacity cost?

A. No. I recognize that the terms of the CSR-1 and CSR-2 rates that would reduce the value of CSR capacity, relative to a SCCT that has no restrictions. However, if Mr. Seelye's 2016 methodolgy (the basis for the current CSR-1 rate) is used, the CSR credit would be in the range of $15/kW month.[11] Notwithstanding this, my

[11] It should be noted that Mr. Seelye did not adjust the avoided capacity cost for the reserve margin, as I am recommending.

recommendation is to increase both the CSR-1 and CSR-2 credits by $2.50/kW month. Table 19 shows the CSR-1 and CSR-2 credits that I recommend in this case. As can be seen, these credits are significantly lower than the avoided capacity cost based on a 2028 SCCT.

Table 19
AG/KIUC Recommend CSR Credits

		Current Rate	Proposed Rate	Increase
CSR-1				
	Transmission	$3.20	$5.70	$2.50
	Primary	$3.31	$5.81	$2.50
CSR-2				
	Transmission	$5.90	$8.40	$2.50
	Primary	$6.00	$8.50	$2.50

Q. Would it also be reasonable to increase the non-compliance penalty?

A. Yes. The non-compliance penalty has been at $16 per KVA/KW since 2009. It should be updated. It should be increased by the same $2.50 per KVA that the demand credit is increased.

Q. Companies' witness Charles Schram discusses the current CSR rates (1 and 2) and concludes that a battery option is more economic. How does this compare to the capacity available from CSR customers?

A. The CSR tariffs permit the Companies to interrupt CSR load for up to 14 hours in a single day, compared to a 4-hour discharge rate for batteries.

Q. Have the Companies interrupted CSR customers for periods that extend beyond the 4-hour discharge rate for a battery?

A. Yes, as I noted above, in June of 2025 the Companies curtailed CSR load for 6-hours. This was a physical interruption. Assuming that a battery has a maximum discharge period of only 4-hours, a 100 MW battery would not substitute for 100 MW of CSR load during such an emergency condition. In December of 2022, during Winter Storm Elliot, the Companies' interrupted all of its curtailable load for a 27-hour period that occurred over two consecutive days.[12] This interruption was also a physical interruption with no buy-through option. Because the interruptions occurred within two consecutive 14-hour periods, the CSR tariff provision was satisfied. A 4-hour discharge battery would not be able to provide this level of capacity.

Q. Does that complete your testimony?

A. Yes.

[12] See KU and LG&E Attachment provided in response to AG/KIUC Question 1-115, a copy of which is included as Baron Exhibit__(SJB-3).

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	
KENTUCKY UTILITIES COMPANY FOR	)	
AN ADJUSTMENT OF ITS ELECTRIC	)	**CASE NO. 2025-00113**
RATES AND APPROVAL OF CERTAIN	)	
REGULATORY AND ACCOUNTING	)	
TREATMENTS	)	

In the Matter of:

ELECTRONIC APPLICATION OF	)	
LOUISVILLE GAS AND ELECTRIC	)	
COMPANY FOR AN ADJUSTMENT OF ITS	)	**CASE NO. 2025-00114**
ELECTRIC AND GAS RATES, AND	)	
APPROVAL OF CERTAIN REGULATORY	)	
AND ACCOUNTING TREATMENTS	)	

EXHIBITS

OF

STEPHEN J. BARON

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

Stephen J. Baron

Sworn to and subscribed before me on this
29th day of August 2025.

Jessica K Inman

Notary Public

Jessica K Inman
NOTARY PUBLIC
Cherokee County, GEORGIA
My Commission Expires 07/31/2027

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF	)	
KENTUCKY UTILITIES COMPANY FOR	)	
AN ADJUSTMENT OF ITS ELECTRIC	)	**CASE NO. 2025-00113**
RATES AND APPROVAL OF CERTAIN	)	
REGULATORY AND ACCOUNTING	)	
TREATMENTS	)	

In the Matter of:

ELECTRONIC APPLICATION OF	)	
LOUISVILLE GAS AND ELECTRIC	)	
COMPANY FOR AN ADJUSTMENT OF ITS	)	**CASE NO. 2025-00114**
ELECTRIC AND GAS RATES, AND	)	
APPROVAL OF CERTAIN REGULATORY	)	
AND ACCOUNTING TREATMENTS	)	

EXHIBIT__(SJB-1)

OF

STEPHEN J. BARON

Professional Qualifications

Of

Stephen J. Baron

Mr. Baron graduated from the University of Florida in l972 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.

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. In January 2024, Mr. Baron became an Executive Consultant with Kennedy and Associates.

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, South 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 July 2025

Date	Case	Jurisdict.	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 July 2025

Date	Case	Jurisdict.	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 July 2025

Date	Case	Jurisdict.	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 July 2025

Date	Case	Jurisdict.	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 July 2025

Date	Case	Jurisdict.	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 July 2025

Date	Case	Jurisdict.	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 July 2025

Date	Case	Jurisdict.	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 July 2025

Date	Case	Jurisdict.	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 July 2025

Date	Case	Jurisdict.	Party	Utility	Subject
6/97	Civil Action No. 94-11474	US Bank-ruptcy 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 Intervenors	West Penn Power Co.	Retail competition issues, rate unbundling, stranded cost analysis.
12/97	R-974104	PA	Duquesne Industrial Intervenors	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.

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Date	Case	Jurisdict.	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-Answering Testimony)	EC-98-40-000	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.

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Date	Case	Jurisdict.	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.

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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 Intervenors	Duquesne Light Company	Provider of last resort issues.
03/04	03A-436E	CO	CF&I Steel, LP and Climax Molybedenum	Public Service Company of Colorado	Purchased Power Adjustment Clause.

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Date	Case	Jurisdict.	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.

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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 Intervenors	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

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Date	Case	Jurisdict.	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

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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 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.

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Date	Case	Jurisdict.	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

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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

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				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

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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 Intervenors	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-SS0	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 July 2025

Date	Case	Jurisdict.	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 July 2025**

Date	Case	Jurisdict.	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 July 2025**

Date	Case	Jurisdict.	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
11/22	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
8/20	E-01345A-19-0236	AZ	Kroger Company	Arizona Public Service Co	Cost of Service, Rate Design

Expert Testimony Appearances
of
Stephen J. Baron
As of July 2025

Date	Case	Jurisdict.	Party	Utility	Subject
10/20	2020-00174	KY	Kentucky Industrial Utility Customers, Inc., KY AG	Kentucky Power Company	Cost of service, net metering, transmission costs.
11/20	20-0665 E-ENEC	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co	Expanded Net Energy Cost ("ENEC")
2/21	2019-224-E 2019-225-E	SC	The South Carolina Office of Regulatory Staff	Duke Energy Carolinas Duke Energy Progress	2020 Integrated Resource Plan Load Forecasting, Reserve Margin Issue
3/21	2020-00349 2020-00350	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co. Kentucky Utilities Co.	Cost of Service, Rate Design. Net Metering issues
3/21	20AL-0432E	CO	Climax Molybdenum	Public Service Company of Colorado	Cost of Service, Rate Design
3/21	20-1476-	OH	Ohio Energy Group	Ohio Edison, Toledo Edison Cleveland Electric Illuminating	Electric Security Rate Plan Standard Service Offer
5/21	20-1040 E-CN	WV	West Virginia Energy Users Group	Appalachian Power Company	Environmental CCN and Surcharge
5/21	20-1012 E-P	WV	West Virginia Energy Users Group	Appalachian Power Company	Infrastructure Investment Tracker and Surcharge
5/21	2020-00238 -UT	NM	COG Operating, LLC	Southwestern Public Service Co.	Cost of Service, Rate Design
6/21	2021-00045	VA	VA Committee For Fair Utility Rates	Dominion Virginia Power Company	Coal Combustion Residuals Rider CCR Cost Allocation, Rate Design
7/21	20-1049 E-P	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co	Excess Accumulated. Def. Income Tax Rate Treatment
7/21	21-00339 E-ENEC	WV	West Virginia Energy Users Group	Appalachian Power Co. Wheeling Power Co.	Expanded Net Energy Cost ("ENEC")
9/21	2021-00058	VA	VA Committee For Fair Utility Rates	Dominion Virginia Power Company	Cost of Service 2020 Triennial Review Case - Cost Allocation, Revenue Apportionment
11/21	21-0658 E-ENEC	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co	Expanded Net Energy Cost ("ENEC")
2/22	2021-0481	KY	Kentucky Industrial Utility Customers, Inc., KY AG	Kentucky Power Company Liberty Utilities	Acquisition of Kentucky Power Co. by Liberty Utilities
2/22	21-0813- E-CS	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co	Solar Energy Rate Recovery
3/22	2021-00229	VA	VA Committee For Fair Utility Rates	Dominion Virginia Power Company	Nuclear Plant Upgrade Rider SNL
3/22	21-00107	TN	East Tennessee Energy Consumers	Kingsport Power Co.	Cost of Service, Rate Design
3/22	2021-00206	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Company	2021 RPS Plan

Expert Testimony Appearances
of
Stephen J. Baron
As of July 2025

Date	Case	Jurisdict.	Party	Utility	Subject
5/22	44160	GA	Georgia Public Service Commission Staff	Georgia Power Company	2022 Integrated Resource Plan Optimal Reserve Margin Issues
6/22	2021-00156	VA	VA Committee For Fair Utility Rates	Dominion Virginia Power Company	2021 RPS Cost Allocation
9/22	22-00393 E-ENEC	WV	West Virginia Energy Users Group	Appalachian Power Co. Wheeling Power Co.	Expanded Net Energy Cost ("ENEC") Coal Inventory Prudence Issues
10/22	44280	GA	Georgia Public Service Commission Staff	Georgia Power Company	2022 Rate Case
11/22	22-0793 E-ENEC	WV	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co	Expanded Net Energy Cost ("ENEC")
1/23	E-01933A-22-0107	AZ	Kroger Company	Tucson Electric Power Co.	Cost of Service, Rate Design
2/23	21-00387	KY	Kentucky Industrial Utility Customers, Inc., Kentucky Attorney General	Kentucky Power Company	Special Contract.
3/23	2022-00166	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Company	2022 RPS Cost Recovery
4/23	22-00286 -UT	NM	COG Operating, LLC	Southwestern Public Service Company	Cost of Service, Rate Design
5/23	E-01345A-22-0144	AZ	Kroger Company	Arizona Public Service Co	Rate Design
6/23	23-23	OH	Ohio Energy Group	Ohio Power Company	Electric Security Rate Plan Transmission Rider Rate Design
7/23	2023-00002	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Company	2023 Triennial Review Case - Cost Allocation, Revenue Apportionment
8/23	23-0377 E-ENEC	WV	West Virginia Energy Users Group	Appalachian Power Co. Wheeling Power Co.	Expanded Net Energy Cost ("ENEC") Coal Inventory Prudence Issues
10/23	23AL-0243E	CO	Climax Molybdenum	Public Service Company of Colorado	Cost of Service, Rate Design
10/23	2023-00002	VA	Virginia Committee For Fair Utility Rates	Virginia Electric Power Company (Dominion)	2023 Biennial Review Case - Cost Allocation, Revenue Apportionment
10/23	23-301 EL-SS0	OH	Ohio Energy Group	Ohio Edison, Toledo Edison	Electric Security Rate Plan
12/23	2023-00312	KY	Domtar Paper Co., LLC	Big Rivers Electric Corporation	Standby and Maintenance Power Rates
7/24	2024-00024	VA	Old Dominion Committee For Fair Utility Rates	Appalachian Power Company	2024 Biennial Review Case - Cost Allocation, Revenue Apportionment

Expert Testimony Appearances
of
Stephen J. Baron
As of July 2025

Date	Case	Jurisdict.	Party	Utility	Subject
7/24	24-0413 E-ENEC	WV	West Virginia Energy Users Group	Appalachian Power Co. Wheeling Power Co.	Expanded Net Energy Cost (“ENEC”) Issues
4/25	24-0854 E-42T	WV	West Virginia Energy Users Group	Appalachian Power Co Wheeling Power Co	Cost of Service, Rate Design
5/25	24-0310- E-PC	WV	West Virginia Energy Users Group	Appalachian Power Co Wheeling Power Co	Securitization Issues
6/25	57568	TX	Freeport McMoRan, Inc.	El Paso Electric Co.	Cost of Service, Rate Design

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC RATES AND APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS	)	**CASE NO. 2025-00113**

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC AND GAS RATES, AND APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS	)	**CASE NO. 2025-00114**

EXHIBIT__(SJB-2)

OF

STEPHEN J. BARON

LG&E Rates TODP AND RTS UNIT COSTS

	Total Company Amount	% to Production		Total Company Production	% to Energy		Total Company Energy	TODP Energy	% of Total	TODP Unit Cost	RTS Energy	% of Total	RTS Unit Cost
PRODUCTION O&M													
COMBINED SUPERVISION & ENGINEERING	10,811,793	100.00%		10,811,793	10.71%	Production Labor	1,158,009	201,132	0.3%	0.010	105,827	0.3%	0.010
STEAM OPERATION													
(501) STEAM OPERATION - Fuel	265,133,825	100.00%		265,133,825	100.00%		265,133,825	46,050,581	61.8%	2.348	24,229,881	61.9%	2.302
(502) Steam Expenses	21,993,335	100.00%		21,993,335	70.51%	ACC502	15,506,931	2,693,369	3.6%	0.137	1,417,138	3.6%	0.135
(505) Electric Expenses	2,463,165	100.00%		2,463,165	23.08%	ACC505	568,484	98,739	0.1%	0.005	51,952	0.1%	0.005
STEAM MAINTENANCE													
(512) Maintenance of Boiler Plant	26,488,226	100.00%		26,488,226	100.00%		26,488,226	4,600,689	6.2%	0.235	2,420,689	6.2%	0.230
(513) Maintenance of Electric Plant	11,671,590	100.00%		11,671,590	100.00%		11,671,590	2,027,216	2.7%	0.103	1,066,636	2.7%	0.101
(514) Maintenance of Misc Steam Plant	1,026,555	100.00%		1,026,555	100.00%		1,026,555	178,300	0.2%	0.009	93,814	0.2%	0.009
HYDRO OPERATION													
(536) Water for Power	43,206	100.00%		43,206	100.00%		43,206	7,504	0.0%	0.000	3,949	0.0%	0.000
HYDRO MAINTENANCE													
(544) Maintenance of Electric Plant	403,136	100.00%		403,136	100.00%		403,136	70,020	0.1%	0.004	36,842	0.1%	0.004
(545) Maintenance of Misc Hydraulic Plant	6,017	100.00%		6,017	100.00%		6,017	1,045	0.0%	0.000	550	0.0%	0.000
OTHER POWER OPERATION													
(547) Fuel	61,485,813	100.00%		61,485,813	100.00%		61,485,813	10,679,352	14.3%	0.544	5,619,026	14.3%	0.534
OTHER POWER SUPPLY													
(555) Purchased Power	51,849,549	100.00%		51,849,549	45.27%	OMPP	23,470,627	4,076,568	5.5%	0.208	2,144,919	5.5%	0.204
LABOR RELATED A&G EXPENSE	56,686,967	51.99%	LABORxAG	29,473,450	40.65%	Prod Labor x A&G	11,982,383	2,081,197	2.8%	0.106	1,095,038	2.8%	0.104
OTHER ITEMS													
Payroll Taxes (Production)	7,165,253	51.99%	LABORxAG	3,725,455	40.65%	Prod Labor x A&G	1,514,577	263,064	0.4%	0.013	138,413	0.4%	0.013
Losses/(Gains) From Disposition Of Allowances	(186,019)	35.63%	Rate Base	(66,287)	6.23%	Rate Base	(4,131)	(718)	0.0%	(0.000)	(378)	0.0%	(0.000)
Investment Tax Credit	(1,311,968)	35.63%	Rate Base	(467,517)	6.23%	Rate Base	(29,138)	(5,061)	0.0%	(0.000)	(2,663)	0.0%	(0.000)
Additional Revenue Requirements	(7,300,724)	35.63%	Rate Base	(2,601,598)	6.23%	Rate Base	(162,147)	(28,163)	0.0%	(0.001)	(14,818)	0.0%	(0.001)
RATE BASE - PROD CASH WORKING CAPITAL	126,666,257	78.65%	O&MxPP	99,622,504	83.36%	O&MxPP	83,049,659	14,424,734			7,589,689		
Return on Rate Base								1,170,987	1.6%	0.060	616,124	1.6%	0.059
Income Taxes								306,055	0.4%	0.016	137,270	0.4%	0.013
Billing Demand								1,961,477,530			1,052,483,619		
TOTAL ENERGY REVENUE REQUIREMENTS								74,471,877		3.797	39,160,209		3.721

KU RATES TODP, RTS UNIT COSTS

	Total Company Amount	% to Production		Total Company Production	% to Energy		Total Company Energy	TODP Energy	% of Total	TODP Unit Cost	RTS Energy	% of Total	RTS Unit Cost
PRODUCTION O&M													
COMBINED SUPERVISION & ENGINEERING	15,981,177	100.00%		15,981,177	10.71%	Production Labor	1,711,681	378,463	0.3%	0.010	174,146	0.3%	0.009
STEAM OPERATION													
(501) STEAM OPERATION - Fuel	372,953,104	100.00%		372,953,104	100.00%		372,953,104	82,462,226	55.2%	2.081	37,944,044	55.2%	2.038
(502) Steam Expenses	32,820,527	100.00%		32,820,527	44.70%	ACC502	14,669,782	3,243,579	2.2%	0.082	1,492,496	2.2%	0.080
(505) Electric Expenses	7,237,284	100.00%		7,237,284	22.72%	ACC505	1,644,500	363,609	0.2%	0.009	167,311	0.2%	0.009
STEAM MAINTENANCE													
(512) Maintenance of Boiler Plant	45,188,273	100.00%		45,188,273	100.00%		45,188,273	9,991,405	6.7%	0.252	4,597,430	6.7%	0.247
(513) Maintenance of Electric Plant	15,383,457	100.00%		15,383,457	100.00%		15,383,457	3,401,377	2.3%	0.086	1,565,104	2.3%	0.084
(514) Maintenance of Misc Steam Plant	2,427,379	100.00%		2,427,379	100.00%		2,427,379	536,708	0.4%	0.014	246,960	0.4%	0.013
HYDRO OPERATION													
(536) Water for Power	-	100.00%		-	100.00%		-	-	0.0%	-	-	0.0%	-
HYDRO MAINTENANCE													
(544) Maintenance of Electric Plant	137,291	100.00%		137,291	100.00%		137,291	30,356	0.0%	0.001	13,968	0.0%	0.001
(545) Maintenance of Misc Hydraulic Plant	-	100.00%		-	100.00%		-	-	0.0%	-	-	0.0%	-
OTHER POWER OPERATION													
(547) Fuel	154,799,167	100.00%		154,799,167	100.00%		154,799,167	34,227,048	22.9%	0.864	15,749,182	22.9%	0.846
OTHER POWER SUPPLY													
(555) Purchased Power	45,422,231	100.00%		45,422,231	78.71%	OMPP	35,753,876	7,905,402	5.3%	0.199	3,637,580	5.3%	0.195
LABOR RELATED A&G EXPENSE	75,236,145	60.64%	LABORxAG	45,621,634	40.65%	Prod Labor x A&G	18,547,400	4,100,944	2.7%	0.103	1,887,002	2.7%	0.101
OTHER ITEMS													
Payroll Taxes (Production)	10,100,868	60.64%	LABORxAG	6,124,956	40.65%	Prod Labor x A&G	2,490,091	550,574	0.4%	0.014	253,340	0.4%	0.014
Losses/(Gains) From Disposition Of Allowances	(273,929)	43.94%	Rate Base	(120,371)	3.76%	Rate Base	(4,520)	(999)	0.0%	(0.000)	(460)	0.0%	(0.000)
Additional Revenue Requirements	21,252,405	43.94%	Rate Base	9,338,822	3.76%	Rate Base	350,687	77,539	0.1%	0.002	35,679	0.1%	0.002
RATE BASE - PROD CASH WORKING CAPITAL	155,388,705	79.14%	O&MxPP	122,966,859	81.78%	O&MxPP	100,565,158	22,235,575			10,231,444		
Return on Rate Base								1,801,427	1.2%	0.045	828,906	1.2%	0.045
Income Taxes								371,293	0.2%	0.009	133,240	0.2%	0.007
Billing Demand								3,962,655,520			1,861,580,355		
TOTAL ENERGY REVENUE REQUIREMENTS								149,440,952		3.771	68,725,927		3.692

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY UTILITIES COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC RATES AND APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS	)	**CASE NO. 2025-00113**

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC AND GAS RATES, AND APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS	)	**CASE NO. 2025-00114**

EXHIBIT__(SJB-3)

OF

STEPHEN J. BARON

Schram

Start Date/Time	End Date/Time	Curtailment Type
1/11/2022 9:00	1/11/2022 17:00	Buy-through option curtailment
1/13/2022 9:00	1/13/2022 17:00	Buy-through option curtailment
1/14/2022 9:00	1/14/2022 17:00	Buy-through option curtailment
1/19/2022 9:00	1/19/2022 17:00	Buy-through option curtailment
1/20/2022 9:00	1/20/2022 17:00	Buy-through option curtailment
1/25/2022 9:00	1/25/2022 17:00	Buy-through option curtailment
1/26/2022 9:00	1/26/2022 17:00	Buy-through option curtailment
1/27/2022 9:00	1/27/2022 17:00	Buy-through option curtailment
1/28/2022 9:00	1/28/2022 17:00	Buy-through option curtailment
1/31/2022 9:00	1/31/2022 17:00	Buy-through option curtailment
2/1/2022 9:00	2/1/2022 17:00	Buy-through option curtailment
2/2/2022 9:00	2/2/2022 17:00	Buy-through option curtailment
2/3/2022 9:00	2/3/2022 17:00	Buy-through option curtailment
2/4/2022 9:00	2/4/2022 17:00	Buy-through option curtailment
2/7/2022 9:00	2/7/2022 17:00	Buy-through option curtailment
3/23/2022 8:00	3/23/2022 16:00	Buy-through option curtailment
3/24/2022 8:00	3/24/2022 16:00	Buy-through option curtailment
3/28/2022 8:00	3/28/2022 16:00	Buy-through option curtailment
3/29/2022 8:00	3/29/2022 16:00	Buy-through option curtailment
4/5/2022 8:00	4/5/2022 16:00	Buy-through option curtailment
4/6/2022 8:00	4/6/2022 16:00	Buy-through option curtailment
4/7/2022 8:00	4/7/2022 16:00	Buy-through option curtailment
4/11/2022 8:00	4/11/2022 16:00	Buy-through option curtailment
6/14/2022 9:00	6/14/2022 17:00	Buy-through option curtailment
7/27/2022 8:00	7/27/2022 16:00	Buy-through option curtailment
8/23/2022 8:00	8/23/2022 16:00	Buy-through option curtailment
12/13/2022 9:00	12/13/2022 17:00	Buy-through option curtailment
12/14/2022 9:00	12/14/2022 17:00	Buy-through option curtailment
12/15/2022 9:00	12/15/2022 17:00	Buy-through option curtailment
12/16/2022 9:00	12/16/2022 17:00	Buy-through option curtailment
12/19/2022 9:00	12/19/2022 17:00	Buy-through option curtailment
12/20/2022 9:00	12/20/2022 17:00	Buy-through option curtailment
12/22/2022 9:00	12/22/2022 17:00	Buy-through option curtailment
12/23/2022 9:00	12/23/2022 11:00	Buy-through option curtailment
12/23/2022 11:00	12/23/2022 23:59	Physical curtailment without buy-through option
12/24/2022 0:00	12/24/2022 14:00	Physical curtailment without buy-through option
1/15/2024 8:00	1/15/2024 18:00	Buy-through option curtailment
1/16/2024 8:00	1/16/2024 18:00	Buy-through option curtailment
1/7/2025 8:00	1/7/2025 18:00	Buy-through option curtailment
1/8/2025 8:00	1/8/2025 18:00	Buy-through option curtailment
1/9/2025 8:00	1/9/2025 18:00	Buy-through option curtailment
1/13/2025 8:00	1/13/2025 18:00	Buy-through option curtailment
1/14/2025 8:00	1/14/2025 18:00	Buy-through option curtailment
1/15/2025 8:00	1/15/2025 18:00	Buy-through option curtailment
1/16/2025 8:00	1/16/2025 16:00	Buy-through option curtailment
1/20/2025 7:00	1/20/2025 19:00	Buy-through option curtailment
1/21/2025 7:00	1/21/2025 19:00	Buy-through option curtailment
1/22/2025 8:00	1/22/2025 18:00	Buy-through option curtailment
1/24/2025 8:00	1/24/2025 18:00	Buy-through option curtailment
2/17/2025 8:00	2/17/2025 18:00	Buy-through option curtailment
2/18/2025 8:00	2/18/2025 18:00	Buy-through option curtailment
2/19/2025 9:00	2/19/2025 19:00	Buy-through option curtailment
2/20/2025 9:00	2/20/2025 19:00	Buy-through option curtailment
2/21/2025 8:00	2/21/2025 18:00	Buy-through option curtailment
6/24/2025 13:54	6/24/2025 20:00	Physical curtailment without buy-through option