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**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

5 In the Matter of:

**QF – QUALIFIED CONGENERATION/SMALL )  
POWER PRODUCTION FACILITY TARIFF – )  
OVER 100 KW FILING OF BIG RIVERS )  
ELECTRIC CORPORATION )**

**TFS No.  
2023-00\_\_\_\_\_**

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**DIRECT TESTIMONY OF JOHN WOLFRAM**

**I. INTRODUCTION**

9 **Q. State your name, occupation, and business address.**

10 A. My name is John Wolfram. I am the Principal of Catalyst Consulting  
11 LLC. My business address is 3308 Haddon Road, Louisville, Kentucky  
12 40241.

13 **Q. On whose behalf are you testifying?**

14 A. I am testifying on behalf of Big Rivers Electric Corporation (“*Big Rivers*”).

15 **Q. Briefly describe your education and work experience.**

16 A. I received a Bachelor of Science degree in Electrical Engineering from the  
17 University of Notre Dame in 1990 and a Master of Science degree in  
18 Electrical Engineering from Drexel University in 1997. I founded  
19 Catalyst Consulting, LLC in June of 2012. From March 2010 through  
20 May 2012, I was a Senior Consultant with The Prime Group, LLC. I have  
21 developed cost of service studies and designed rates for numerous electric  
22 and gas utilities, including electric distribution cooperatives, generation  
23 and transmission cooperatives, municipal utilities, and investor-owned

1 utilities. I have performed economic analyses, rate mechanism reviews,  
2 ISO/RTO membership evaluations, and wholesale formula rate reviews. I  
3 have also been employed by the parent companies for Louisville Gas and  
4 Electric Company and Kentucky Utilities Company, and by the Cincinnati  
5 Gas & Electric Company. I began my career at the PJM Interconnection.  
6 A more detailed description of my qualifications is included in Exhibit  
7 Wolfram-1.

8 **Q. Have you ever testified before the Kentucky Public Service**  
9 **Commission (the “Commission”)?**

10 A. Yes. I have testified in numerous regulatory proceedings before the  
11 Commission. A listing of my testimony in other proceedings is included in  
12 Exhibit Wolfram-1.

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

14 A. The purpose of my testimony is to support the QF– Qualified  
15 Cogeneration/Small Power Production Facility Tariff – Over 100 KW rate  
16 schedule that Big Rivers submits in this docket, pursuant to the Order of  
17 the Commission in Case No. 2021-00289.<sup>1</sup> The proposed rate schedule  
18 replaces Big Rivers’ existing QFS and QFP tariffs.

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<sup>1</sup> See *In The Matter Of: Electronic Tariff Filing Of Big Rivers Electric Corporation And Kenergy Corp. To Implement A New Standby Service Tariff*, Order (Mar. 3, 2022), Ordering Paragraph 3.

1 **II. QF RATE SCHEDULE**

2 **Q. Please describe the QF rate schedule submitted in this filing.**

3 A. The QF rate schedule is available to any cogeneration and/or small power  
4 production facility (i) that has a net output of between 100 kW and 5,000  
5 kW, and (ii) that meets the criteria for Qualifying Facility set forth in 807  
6 KAR 5:054 Section 4 (“*QF Member*”).

7 **Q. Please describe the rates for capacity and energy in the QF rate**  
8 **schedule submitted in this filing.**

9 A. The tariff specifies what Big Rivers shall use as the basis for negotiating a  
10 final purchase rate with QF Members. Credits are separately described  
11 for capacity and for energy, consistent with 807 KAR 5:054 Section 7(4).

12 **Q. What is the basis for the proposed capacity credit?**

13 A. The capacity amount will be the QF Member’s capacity accredited by the  
14 Midcontinent Independent System Operator (“*MISO*”). The capacity  
15 credit is MISO’s Planning Resource Auction (“*PRA*”) Auction Clearing  
16 Price (“*ACP*”) for the Big Rivers zone for the applicable resource auction  
17 time period.<sup>2</sup>

18 **Q. Why use the MISO PRA ACP for determining the capacity credit?**

19 A. The MISO PRA ACP is representative of Big Rivers’ avoided capacity cost,  
20 or the incremental costs that, but for the purchase of capacity from a QF

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<sup>2</sup> Before 2023, MISO conducted its PRA on an annual basis. In April 2023, MISO will implement the new seasonal PRA construct on a quarterly basis, as approved by FERC on August 31, 2022, in Docket No. ER22-495.

1 or other facility, Big Rivers would have to either purchase or generate.  
2 The MISO PRA ACP is the value at which MISO provides capacity; it is  
3 the price at which Big Rivers is compensated for its generating capacity,  
4 and the price at which Big Rivers would purchase capacity if needed.

5 **Q. What is the basis for the proposed energy credit?**

6 A. The energy credit is based on the actual Locational Marginal Price  
7 (“LMP”) for energy set by MISO at the applicable load node during each  
8 hour of the day at the time of delivery of energy by the QF.

9 **Q. Why use LMP as the basis for the energy credit?**

10 A. Big Rivers participates in the day-ahead and real-time MISO energy  
11 markets. The LMP represents the avoided energy cost for Big Rivers, or  
12 the incremental costs that, but for the purchase of energy from a QF or  
13 other facility, Big Rivers would have to either purchase or generate. This  
14 method reflects the real-time cost that Big Rivers would otherwise pay to  
15 purchase energy in the MISO energy market if needed.

16 **Q. How do the proposed QF capacity and energy charges compare to**  
17 **those approved by the Commission for East Kentucky Power**  
18 **Cooperative (“EKPC”)?**

19 A. The approach proposed by Big Rivers is very similar to that incorporated  
20 into the QF rates for EKPC as approved by the Commission.<sup>3</sup> EKPC is a

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<sup>3</sup> See *In the Matter of: Electronic Tariff Filing of East Kentucky Power Cooperative, Inc. and Its Member Distribution Cooperatives for Approval of Proposed Changes to Their Qualified Cogeneration and Small Power Production Facilities Tariffs*, P.S.C. Case No. 2021-00198, Order (Oct. 26, 2021).

1 member of PJM, while Big Rives is a member of MISO. The wholesale  
2 markets for the two RTOs are based on the same principles: the energy  
3 markets are based on real time LMP, and the capacity markets are based  
4 on auctions for accredited capacity resources. For these reasons, the  
5 proposed QF tariff rates for Big Rivers are conceptually similar to those  
6 effective for EKPC.

7 **Q. Are the rates, terms, and conditions of the QF rate schedule fair,**  
8 **just and reasonable?**

9 A. Yes. The rates are based on sound cost-of-service principles and are based  
10 on Big Rivers' avoided costs as described in 807 KAR 5:054 Section 1(1).  
11 The terms and conditions are consistent with those already approved by  
12 the Commission.

13 **Q. Does the QF Rate Schedule include a market administration**  
14 **charge, similar to that in the EKPC QF tariffs?**

15 A. No. Because there are only two QF Members on the Big Rivers system at  
16 this time, Big Rivers has elected initially to not include a charge to cover  
17 Big Rivers' market participation costs, such as a market administration  
18 fee. Big Rivers may seek to add a market administration fee to this tariff  
19 in the future.

20

1 **III. CONCLUSION**

2 **Q. Please summarize your conclusion and recommendation.**

3 A. The proposed QF rate schedule is fair, just, and reasonable. The tariff  
4 rates are based on sound cost-of-service principles and incorporate  
5 avoided costs as described in 807 KAR 5:054 Section 1(1). The tariff terms  
6 and conditions are consistent with other, Commission-approved tariffs of  
7 this sort. For these reasons, the Commission should accept the QF rate  
8 schedule as filed.

9 **Q. Does this conclude your testimony?**

10 A. Yes.

## JOHN WOLFRAM

### Summary of Qualifications

Provides consulting services to investor-owned utilities, rural electric cooperatives, and municipal utilities regarding utility rate and regulatory filings, cost of service studies, wholesale and retail rate designs, tariffs and special contracts, formula rates, and other analyses.

### Employment

#### CATALYST CONSULTING LLC

Principal

June 2012 – Present

Provide consulting services in the areas of tariff development, formula rates, regulatory analysis, economic development, revenue requirements, cost of service, rate design, special rates, audits, rate filings, and other utility regulatory areas.

#### THE PRIME GROUP, LLC

Senior Consultant

March 2010 – May 2012

#### LG&E and KU, Louisville, KY

(Louisville Gas & Electric Company and Kentucky Utilities Company)  
Director, Customer Service & Marketing (2006 - 2010)  
Manager, Regulatory Affairs (2001 - 2006)  
Lead Planning Engineer, Generation Planning (1998 - 2001)  
Power Trader, LG&E Energy Marketing (1997 - 1998)

1997 - 2010

#### PJM INTERCONNECTION, LLC, Norristown, PA

Project Lead – PJM OASIS Project  
Chair, Data Management Working Group

1990 - 1993; 1994 - 1997

#### CINCINNATI GAS & ELECTRIC COMPANY, Cincinnati, OH

Electrical Engineer - Energy Management System

1993 - 1994

### Education

Bachelor of Science Degree in Electrical Engineering, University of Notre Dame, 1990  
Master of Science Degree in Electrical Engineering, Drexel University, 1997  
Leadership Louisville, 2006

### Associations

Senior Member, Institute of Electrical and Electronics Engineers (“IEEE”) & Power Engineering Society

### Articles

“FERC Formula Rate Resurgence” *Public Utilities Fortnightly*, Vol. 158, No. 9, July 2020, 34-37.

“Economic Development Rates: Public Service or Piracy?” *IAEE Energy Forum*, International Association for Energy Economics, 2016 Q1 (January 2016), 17-20.

## **Presentations**

“New Developments in Kentucky Rate Filings” presented to Kentucky Electric Cooperatives Accountants' Association Summer Meeting, Jun. 2022.

“Avoiding Shock: Communicating Rate Changes” presented to APPA Business & Financial Conference, Sep. 2020.

“Revisiting Rate Design Strategies” presented to APPA Public Power Forward Summit, Nov. 2019.

“Utility Rates at the Crossroads” presented to APPA Business & Financial Conference, Sep. 2019.

“New Developments in Kentucky Rate Filings” presented to Kentucky Electric Cooperatives Accountants' Association Summer Meeting, Jun. 2019.

“Electric Rates: New Approaches to Ratemaking” presented to CFC Statewide Workshop for Directors, Jan. 2019.

“The Great Rate Debate: Residential Demand Rates” presented to CFC Forum, Jun. 2018.

“Benefits of Cost of Service Studies” presented to Tri-State Electric Cooperatives Accountants' Association Spring Meeting, Apr. 2017.

“Proper Design of Utility Rate Incentives” presented to APPA/Area Development's Public Power Consultants Forum, Mar. 2017.

“Utility Hot Topics and Economic Development” presented to APPA/Area Development's Public Power Consultants Forum, Mar. 2017.

“Emerging Rate Designs” presented to CFC Independent Borrowers Executive Summit, Nov. 2016.

“Optimizing Economic Development” presented to Grand River Dam Authority Municipal Customer Annual Meeting, Sept. 2016.

“Tomorrow's Electric Rate Designs, Today” presented to CFC Forum, Jun. 2016.

“Reviewing Rate Class Composition to Support Sound Rate Design” presented to EEI Rate and Regulatory Analysts Group Meeting, May 2016.

“Taking Public Power Economic Development to the Next Level” presented to APPA/Area Development's Public Power Consultants Forum, Mar. 2016.

“Ratemaking for Environmental Compliance Plans” presented to NARUC Staff Subcommittee on Accounting and Finance Fall Conference, Sep. 2015.

“Top Utility Strategies for Successful Attraction, Retention & Expansion” presented to APPA/Area Development's Public Power Consultants Forum, Mar. 2015.

“Economic Development and Load Retention Rates” presented to NARUC Staff Subcommittee on Accounting and Finance Fall Conference, Sep. 2013.

“Rates for Distributed Generation” presented to 2010 Electric Cooperative Rate Conference, Oct. 2010.



“What Utilities Can Do to Advance Energy Efficiency in Kentucky” panel session of Second Annual Kentucky Energy Efficiency Conference, Oct. 2007.

### **Expert Witness Testimony & Proceedings**

#### FERC

Submitted direct testimony for Black Hills Colorado Electric, LLC in FERC Docket No. ER22-2185 regarding a proposed Transmission Formula Rate.

Submitted testimony for Evergy Kansas Central, Inc. and Evergy Generating, Inc. in FERC Docket Nos. ER22-1974-000, ER22-1975-000 and ER22-1976-000 regarding revised capital structures under transmission and generation formula rates.

Submitted affidavit for Constellation Mystic Power, LLC in FERC Docket No. ER18-1639-000 in response to arguments raised in formal challenges to an informational filing required for a cost-of-service rate for the operation of power plants in ISO New England.

Submitted direct testimony for El Paso Electric Company in FERC Docket No. ER22-282 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for TransCanyon Western Development, LLC in FERC Docket No. ER21-1065 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Cleco Power LLC in FERC Docket No. ER21-370 regarding a proposed rate schedule for Blackstart Service under Schedule 33 of the MISO Open Access Transmission, Energy and Operating Reserve Markets Tariff.

Submitted direct testimony for Constellation Mystic Power, LLC in FERC Docket No. ER18-1639-005 supporting a compliance filing for a cost-of-service rate for compensation for the continued operation of power plants in ISO New England.

Submitted direct testimony for DATC Path 15, LLC in FERC Docket No. ER20-1006 regarding a proposed wholesale transmission rate.

Submitted direct testimony for Tucson Electric Power Company in FERC Docket No. ER19-2019 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Cheyenne Light, Fuel & Power Company in FERC Docket No. ER19-697 regarding a proposed Transmission Formula Rate.

Supported Kansas City Power & Light in FERC Docket No. ER19-1861-000 regarding revisions to fixed depreciation rates in the KCP&L SPP Transmission Formula Rate.

Supported Westar Energy and Kansas Gas & Electric Company in FERC Docket No. ER19-269-000 regarding revisions to fixed depreciation rates in the Westar SPP Transmission Formula Rate.

Submitted direct testimony for Midwest Power Transmission Arkansas, LLC in FERC Docket No. ER15-2236 regarding a proposed Transmission Formula Rate.

Submitted direct testimony for Kanstar Transmission, LLC in FERC Docket No. ER15-2237 regarding a proposed Transmission Formula Rate.

Supported Westar Energy and Kansas Gas & Electric Company in FERC Docket Nos. FA15-9-000 and FA15-15-000 regarding an Audit of Compliance with Rates, Terms and Conditions of Westar's Open Access Transmission Tariff and Formula Rates, Accounting Requirements of the Uniform System of Accounts, and Reporting Requirements of the FERC Form No. 1.

Submitted direct testimony for Westar Energy in FERC Docket Nos. ER14-804 and ER14-805 regarding proposed revisions to a Generation Formula Rate.

Supported Intermountain Rural Electric Association and Tri-State G&T in FERC Docket No. ER12-1589 regarding revisions to Public Service of Colorado's Transmission Formula Rate.

Supported Intermountain Rural Electric Association in FERC Docket No. ER11-2853 regarding revisions to Public Service of Colorado's Production Formula Rate.

Supported Kansas Gas & Electric Company in FERC Docket No. FA14-3-000 regarding an Audit of Compliance with Nuclear Plant Decommissioning Trust Fund Regulations and Accounting Practices.

Supported LG&E Energy LLC in FERC Docket No. PA05-9-000 regarding an Audit of Code of Conduct, Standards of Conduct, Market-Based Rate Tariff, and MISO's Open Access Transmission Tariff at LG&E Energy LLC.

Submitted remarks and served on expert panel in FERC Docket No. RM01-10-000 on May 21, 2002 in Standards of Conduct for Transmission Providers staff conference, regarding proposed rulemaking on the functional separation of wholesale transmission and bundled sales functions for electric utilities.

#### Kansas

Submitted report for Westar Energy, Inc. in Docket No. 21-WCNE-103-GIE regarding plans and options for funding the decommissioning trust fund, depreciation expenses, and overall cost recovery in the event of premature closing of the Wolf Creek nuclear plant.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 18-WSEE-328-RTS regarding overall rate design, prior rate case settlement commitments, lighting tariffs, an Electric Transit rate schedule, Electric Vehicle charging tariffs, and tariff general terms and conditions.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 18-KG&E-303-CON regarding the Evaluation, Measurement and Verification ("EM&V") of an energy efficiency demand response program offered pursuant to a large industrial customer special contract.

Submitted report for Westar Energy, Inc. in Docket No. 18-WCNE-107-GIE regarding plans and options for funding the decommissioning trust fund, depreciation expenses, and overall cost recovery in the event of premature closing of the Wolf Creek nuclear plant.

Submitted direct and rebuttal testimony for Westar Energy, Inc. in Docket No. 15-WSEE-115-RTS regarding rate designs for large customer classes, establishment of a balancing account related to new rate options, establishment of a tracking mechanism for costs related to compliance with mandated cyber and physical security standards, other rate design issues, and revenue allocation.

#### Kentucky

Submitted direct testimony on behalf of Big Rivers Electric Corporation and Kenergy Corp. in Case No. 2023-00045 regarding a marginal cost of service study in support of an economic development rate for a special contract.

Submitted direct and rebuttal testimony and responses to data requests on behalf of Jackson Purchase Energy Corporation in Case No. 2021-00358 regarding revenue requirements, adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2021-00289 regarding a Large Industrial Customer Standby Service Tariff.

Submitted direct testimony on behalf of Big Rivers Electric Corporation and Jackson Purchase Energy Corporation in Case No. 2021-00282 regarding a marginal cost of service study in support of an economic development rate for a special contract.

Submitted direct testimony, responses to data requests, and rebuttal testimony on behalf of sixteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case Nos. 2021-00104 through 2021-00119 regarding rate design for the pass-through of a proposed wholesale rate revision.

Submitted direct testimony and responses to data requests on behalf of Kenergy Corp. in Case No. 2021-00066 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony on behalf of Big Rivers Electric Corporation in Case No. 2021-00061 regarding two cost of service studies in a review of the Member Rate Stability Mechanism Charge for calendar year 2020.

Submitted direct testimony and responses to data requests on behalf of Licking Valley R.E.C.C. in Case No. 2020-00338 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Cumberland Valley Electric in Case No. 2020-00264 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Taylor County R.E.C.C. in Case No. 2020-00278 regarding the cost support and tariff changes for the implementation of a Prepay Metering Program.

Submitted direct testimony and responses to data requests on behalf of Meade County R.E.C.C. in Case No. 2020-00131 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Clark Energy Cooperative in Case No. 2020-00104 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Big Rivers Electric Corporation in Case No. 2019-00435 regarding an Environmental Compliance Plan and Environmental Surcharge rate mechanism.

Submitted direct testimony and responses to data requests on behalf of Jackson Energy Cooperative in Case No. 2019-00066 regarding revenue requirements, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and responses to data requests on behalf of Jackson Purchase Energy Corporation in Case No. 2019-00053 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a streamlined rate case.

Submitted direct testimony and data request responses on behalf of Big Rivers Electric Corporation in Case No. 2018-00146 regarding ratemaking issues associated with the anticipated termination of contracts regarding the operation of an electric generating plant owned by the City of Henderson, Kentucky.

Submitted direct testimony on behalf of fifteen distribution cooperative owner-members of East Kentucky Power Cooperative in Case No. 2018-00050 regarding the economic evaluation of and potential cost shift resulting from a proposed member purchased power agreement.

Submitted direct testimony on behalf of Big Sandy R.E.C.C. in Case No. 2017-00374 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct testimony on behalf of Progress Metal Reclamation Company in Kentucky Power Company Case No. 2017-00179 regarding the potential implementation of a Load Retention Rate or revisions to an Economic Development Rate.

Submitted direct testimony on behalf of Kenergy Corp. and Big Rivers Electric Corporation in Case No. 2016-00117 regarding a marginal cost of service study in support of an economic development rate for a special contracts customer.

Submitted rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2014-00134 regarding ratemaking treatment of revenues associated with proposed wholesale market-based-rate purchased power agreements with entities in Nebraska.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2013-00199 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2012-00535 regarding revenue requirements, pro forma adjustments, cost of service and rate design in a base rate case.

Submitted direct and rebuttal testimony on behalf of Big Rivers Electric Corporation in Case No. 2012-00063 regarding an Environmental Compliance Plan and Environmental Surcharge rate mechanism.

Submitted direct, rebuttal, and rehearing direct testimony on behalf of Big Rivers Electric Corporation in Case No. 2011-00036 regarding revenue requirements and pro forma adjustments in a base rate case.

Submitted direct testimony for Louisville Gas & Electric Company in Case No. 2009-00549 and for Kentucky Utilities Company in Case No. 2009-00548 for adjustment of electric and gas base rates, in support of a new service offering for Low Emission Vehicles, revised special charges, and company offerings aimed at assisting customers.

Submitted discovery responses for Kentucky Utilities and/or Louisville Gas & Electric Company in various customer inquiry matters, including Case Nos. 2009-00421, 2009-00312, and 2009-00364.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2008-00148 regarding the 2008 Joint Integrated Resource Plan.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Administrative Case No. 2007-00477 regarding an investigation of the energy and regulatory issues in Kentucky's 2007 Energy Act.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2007-00319 for the review, modification, and continuation of Energy Efficiency Programs and DSM Cost Recovery Mechanisms.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2007-00067 for approval of a proposed Green Energy program and associated tariff riders.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2005-00467 and 2005-00472 regarding a Certificate of Public Convenience and Necessity for the construction of transmission facilities.

Submitted discovery responses for Kentucky Utilities in Case No. 2005-00405 regarding the transfer of a utility hydroelectric power plant to a private developer.

Submitted discovery responses for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2005-00162 for the 2005 Joint Integrated Resource Plan.

Presented company position for Louisville Gas & Electric Company and Kentucky Utilities Company at public meetings held in Case Nos. 2005-00142 and 2005-00154 regarding routes for proposed transmission lines.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in a Focused Management Audit of Fuel Procurement practices by Liberty Consulting in 2004.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in an Investigation into their Membership in the Midwest Independent Transmission System Operator, Inc. ("MISO") in Case No. 2003-00266.

Supported Louisville Gas & Electric Company and Kentucky Utilities Company in a Focused Management Audit of its Earning Sharing Mechanism by Barrington-Wellesley Group in 2002-2003.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2002-00381 regarding a Certificate of Public Convenience and Necessity for the acquisition of four combustion turbines.

Submitted direct testimony for Louisville Gas & Electric Company and Kentucky Utilities Company in Case No. 2002-00029 regarding a Certificate of Public Convenience and Necessity for the acquisition of two combustion turbines.

#### Missouri

Submitted direct, rebuttal and surrebuttal testimony for Evergy Metro, Inc. in Case No. ER-2022-0130 regarding a jurisdictional cost allocation analysis in a retail rate case.

#### Virginia

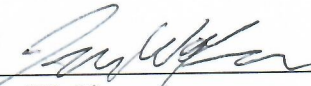
Submitted direct testimony for Kentucky Utilities Company d/b/a Old Dominion Power in Case No. PUE-2002-00570 regarding a Certificate of Public Convenience and Necessity for the acquisition of four combustion turbines.

**BIG RIVERS ELECTRIC CORPORATION**

**QF – QUALIFIED CONGENERATION/SMALL  
POWER PRODUCTION FACILITY TARIFF – OVER 100 KW  
FILING OF BIG RIVERS ELECTRIC CORPORATION  
TFS No. 2023-00\_\_**

**VERIFICATION**

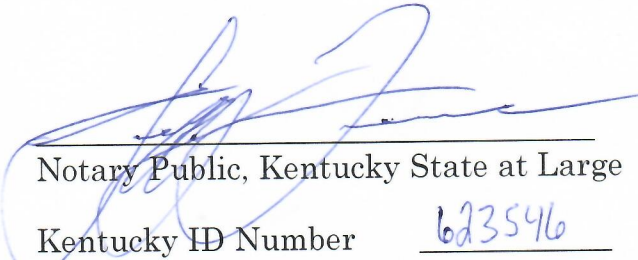
I, John Wolfram, verify, state, and affirm that I prepared or supervised the preparation of the Direct Testimony filed with this Verification, and that this Direct Testimony is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

  
\_\_\_\_\_  
John Wolfram

COMMONWEALTH OF KENTUCKY            )  
COUNTY OF JEFFERSON COUNTY        )

SUBSCRIBED AND SWORN TO before me by John Wolfram on this the 21  
day of February, 2023.

**GEOFFREY LEASE**  
Notary Public - State at Large  
Kentucky  
My Commission Expires June 09, 2023  
Notary ID 623546

  
\_\_\_\_\_  
Notary Public, Kentucky State at Large  
Kentucky ID Number 623546  
My Commission Expires 06-09-2023

