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APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE  
ELECTRIC POWER COMPANY FOR § OF  
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

DIRECT TESTIMONY

OF

KARL J. NALEPA

ON BEHALF OF

CITIES ADVOCATING REASONABLE DEREGULATION

MARCH 31, 2021

SOAH DOCKET NO. 473-21-0538  
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SCHEDULES

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ATTACHMENTS

Attachment A Statement of Qualifications  
Attachment B Summary of Previously Filed Testimony

WORKPAPERS: Provided on CD

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**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE**  
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**DIRECT TESTIMONY OF KARL J. NALEPA**

**I. INTRODUCTION**

1  
2 **Q. PLEASE STATE YOUR NAME, OCCUPATION AND ADDRESS.**

3 A. My name is Karl J. Nalepa. I am President of ReSolved Energy Consulting, LLC (“REC”),  
4 an independent utility consulting company. My business address is 11044 Research  
5 Boulevard, Suite A-420, Austin, Texas 78759.

6 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE AND**  
7 **EDUCATIONAL BACKGROUND.**

8 A. I have been a partner in REC since July 2011. I joined R.J. Covington Consulting, REC’s  
9 predecessor firm, in June 2003. I lead our firm’s regulated market practice, where I  
10 represent the interests of clients in utility regulatory proceedings, prepare client cost  
11 studies, and develop client regulatory filings. Before joining REC, I served for more than  
12 five years as an Assistant Director at the Railroad Commission of Texas (“RRC”). In this  
13 position, I was responsible for overseeing the economic regulation of natural gas utilities  
14 in Texas, which included supervising staff casework, advising Commissioners on  
15 regulatory issues, and serving as a Technical Rate Examiner in regulatory proceedings.  
16 Prior to joining the RRC, I worked as an independent consultant advising clients on a broad  
17 range of electric and natural gas industry issues, and before that I spent five years as a  
18 supervising consultant with Resource Management International, Inc. I also served for  
19 four years as a Fuel Analyst at the Public Utility Commission of Texas (“PUC” or  
20 “Commission”), where I evaluated fuel issues in electric utility rate filings, participated in  
21 electric utility-related rulemaking proceedings, and participated in the review of electric  
22 utility resource plans. My professional career began with eight years in the reservoir  
23 engineering department of Transco Exploration Company, which was an affiliate of  
24 Transco Gas Pipeline Company, a major interstate pipeline company.

1 I hold a Bachelor of Science degree in Mineral Economics and a Masters of Science degree  
2 in Petroleum Engineering and am a certified mediator. My Statement of Qualifications is  
3 included as Attachment A.

4 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

5 A. Yes, I have testified many times before the Commission as well as the RRC on a variety  
6 of regulatory issues. I have also provided testimony before the Louisiana Public Service  
7 Commission, Arkansas Public Service Commission, and Colorado Public Utilities  
8 Commission. A summary of my previously filed testimony is included as Attachment B.  
9 In addition, I have provided analysis and recommendations in numerous city-level  
10 regulatory proceedings that resulted in decisions without written testimony.

11 **Q. ON WHOSE BEHALF ARE YOU OFFERING TESTIMONY IN THIS**  
12 **PROCEEDING?**

13 A. I am offering testimony on behalf of Cities Advocating Reasonable Deregulation  
14 (“CARD”).

15 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

16 A. The purpose of my testimony is to present certain recommendations regarding  
17 Southwestern Electric Power Company’s (“SWEPCO” or “Company”) rate request. I  
18 would note that failure to address a particular issue in my testimony is not indicative of my  
19 agreement with the Company’s position on those issues.

20 **II. CONCLUSIONS AND RECOMMENDATIONS**

21 **Q. WHAT ISSUES ARE YOU ADDRESSING WITH REGARDS TO THE**  
22 **COMPANY’S STATEMENT OF INTENT FILING?**

23 A. I am sponsoring CARD’s cost of service model.

24 **Q. WHAT ARE YOUR RECOMMENDATIONS?**

25 A. I recommend the Commission adopt CARD’s adjustments to the Company’s proposed  
26 revenue requirement and the resulting revenue requirement.

1 **Q. HOW DO CARD'S RECOMMENDATIONS IMPACT SWEPCO'S PROPOSED**  
2 **REVENUE REQUIREMENT?**

3 A. SWEPCO is requesting an overall net increase in annual Texas retail base revenues of  
4 \$90,199,736, which is an increase of 26.03% exclusive of fuel and rider revenues<sup>1</sup> The  
5 impact of CARD's recommendations is to reduce SWEPCO's proposed revenue increase  
6 by \$70,255,335. A summary of CARD's adjustments is included in Figure 1 of my  
7 testimony. The Excel version of Figure 1 is included with my workpapers.

8 **III. COST OF SERVICE MODEL**

9 **Q. ARE YOU SPONSORING CARD'S COST OF SERVICE ADJUSTMENTS?**

10 A. Yes. I am sponsoring CARD's recommended cost of service adjustments to the  
11 Company's Cost of Service Model. A summary of CARD's adjustments is included in  
12 Figure 1 in my testimony. CARD's adjustments were made to SWEPCO's filed cost of  
13 service model and CARD's recommended cost of service is thus derived from SWEPCO's  
14 model. CARD's adjusted model is provided in my workpapers.

15 **Q. ARE YOU SPONSORING ALL THE CHANGES TO THE MODEL?**

16 A. No. I am sponsoring CARD's cost of service model and combined results. Other CARD  
17 witnesses are filing testimony in this proceeding, and sponsor their own specific  
18 adjustments. Figure 1 summarizes these adjustments by witness. Note that these are stand-  
19 alone impacts and will not sum to the total CARD adjustment because of the interactive  
20 nature of certain adjustments. For example, CARD's rate base adjustment is calculated  
21 based on SWEPCO's proposed rate of return. CARD's rate of return adjustment is  
22 calculated based on SWEPCO's proposed rate base. The combined CARD adjustment  
23 reflects both the adjusted rate base AND the adjusted rate of return.

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<sup>1</sup> Petition and Statement of Intent to Change Rates at 4. Note that this reflects a base rate increase of \$105,026,238 less \$14,826,502 of TCRF and DCRF revenues.

Figure 1

Witness	Issues	Adjustment (Total Company)	Revenue Requirement (Total Company)	Revenue Requirement (Texas Jurisdictional)
Scott Norwood	Dolet Hills nonfuel O&M	(\$10,389,125)	(\$10,389,125)	(\$4,068,381)
	Retired gas units nonfuel O&M	(\$1,101,670)	(\$1,101,670)	(\$431,414)
	Cajun Contract operating reserves	(\$4,200,000)	(\$4,200,000)	(\$1,477,140)
	Coal & Lignite inventories (rate base)	(\$54,459,773)	(\$3,934,138)	(\$1,478,449)
Mark Garrett	SWEPSCO payroll	(\$1,496,365)	(\$1,496,365)	(\$623,862)
	AEPSC payroll	(\$3,804,876)	(\$3,804,876)	(\$1,489,989)
	SWEPSCO STI	(\$2,187,400)	(\$2,187,400)	(\$911,967)
	AEPSC STI	(\$998,579)	(\$998,579)	(\$391,044)
	LTI	(\$1,025,993)	(\$1,025,993)	(\$371,024)
	OPEB SFAS 106 expense	(\$5,406,303)	(\$5,406,303)	(\$2,117,108)
	Vegetation Management expense	(\$5,000,000)	(\$5,000,000)	(\$5,000,000)
	Self-Insurance expense	(\$1,689,700)	(\$1,689,700)	(\$1,689,700)
	Dolet Hills depreciation expense	(\$1,909,171)	(\$1,909,171)	(\$705,313)
	Amortization of Unprotected EDFIT	(\$20,577,853)	(\$20,577,853)	(\$7,602,161)
David Garrett	Depreciation Rates	various rates	(\$18,389,125)	(\$7,074,296)
Randall Woolridge	Rate of Return	ROE: 9.0% cost of debt: 4.18% common equity: 49.37% LT debt: 50.63%	(\$35,781,241)	(\$13,446,590)

2 Note that the Texas jurisdictional allocation factors are taken from SWEPSCO Schedule A-  
3 1 unless otherwise reflected in a consultant's testimony.

1 **Q. WHAT IS THE RESULT OF THE COMBINED ADJUSTMENTS TO THE**  
2 **COMPANY'S PROPOSED COST OF SERVICE?**

3 A. Based on the adjustments summarized in Figure 1, CARD's analysis results in a Texas  
4 retail revenue deficiency of \$34,800,903.<sup>2</sup> This is a reduction of \$70,255,335 to  
5 SWEPCO's claimed revenue deficiency of \$105,026,238 before TCRF and DCRF revenue  
6 offsets.

7 **Q. WHAT IS THE RESULT OF THE COMBINED ADJUSTMENTS AFTER**  
8 **CONSIDERING THE TCRF AND DCRF REVENUES?**

9 A. Current TCRF and DCRF revenues total \$14,826,502. Subtracting these revenues from  
10 CARD's revenue deficiency results in a net revenue deficiency of \$19,974,401. This  
11 represents an increase of 5.8% over adjusted Texas retail test year base rate revenues  
12 exclusive of fuel and rider revenues.

13 **Q. WHAT IS THE IMPACT ON REVENUE DISTRIBUTION OF CARD'S**  
14 **ADJUSTMENTS?**

15 A. Based on SWEPCO's revenue distribution methodology, CARD's adjusted revenue  
16 requirement would result in the revenue distribution shown in Figure 2:

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<sup>2</sup> From Schedule P-1, the total Company revenue deficiency is \$228,419,735 and Texas retail deficiency is \$105,026,238. This reflects a composite Texas jurisdictional allocator of 45.98%. Applying this allocator to CARD's total Company proposed revenue deficiency of \$75,687,876 on tab A, page 2 (Rev Deficiency) in CARD's cost of service model results in a Texas retail revenue deficiency of \$34,800,903.



Figure 2

MAJOR RATE CLASS	PRESENT RATE SCHEDULE REVENUE	BASE REVENUE CHANGE	BASE PERCENT INCREASE	FUEL REVENUE	TCRF/DCRF REVENUE	OTHER RIDER REVENUE	PRESENT TOTAL REVENUE	PROPOSED TOTAL REVENUE	TOTAL % CHANGE @ PROPOSED
RESIDENTIAL	147,077,995	13,610,108	9.25%	67,292,540	6,149,974	2,813,216	223,333,725	230,793,859	3.34%
GENERAL SERVICE	22,667,595	2,477,113	10.93%	8,453,460	846,690	191,888	32,159,633	33,790,056	5.07%
LIGHTING & POWER	123,864,927	13,535,338	10.93%	87,389,121	5,275,081	2,183,709	218,712,838	226,973,096	3.78%
COTTON GIN	265,617	29,026	10.93%	156,913	18,170	270	440,970	451,826	2.46%
TOTAL COMMERCIAL	146,798,138	16,041,477	10.93%	95,999,495	6,139,941	2,375,868	251,313,442	261,214,977	3.94%
INDUSTRIAL	41,956,723	4,584,918	10.93%	44,018,981	2,098,532	291,995	88,366,231	90,852,617	2.81%
TOTAL COMM & INDUSTRIAL	188,754,861	20,626,394	10.93%	140,018,476	8,238,473	2,667,863	339,679,673	352,067,594	3.65%
MUNICIPAL	3,929,551	175,597	3.15%	2,706,185	162,520	66,981	6,865,237	6,878,314	0.19%
MUNICIPAL LIGHTING	2,297,255	102,622	6.72%	840,413	87,636	1,891	3,227,194	3,242,180	0.46%
TOTAL MUNICIPAL	6,226,806	278,219	4.47%	3,546,598	250,156	68,871	10,092,431	10,120,494	0.28%
LIGHTING	4,443,639	285,841	6.43%	1,744,624	187,898	8,867	6,385,028	6,482,970	1.53%
TOTAL FIRM RETAIL	346,503,301	34,800,562	10.04%	212,602,238	14,826,502	5,558,817	579,490,857	599,464,918	3.45%

2 Q. DOES THIS COMPLETE YOUR DIRECT TESTIMONY?

3 A. Yes, at this time.

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DIRECT TESTIMONY AND ATTACHMENTS OF

KARL J. NALEPA

ATTACHMENT A

STATEMENT OF QUALIFICATIONS

## **KARL J. NALEPA**

Mr. Nalepa is an energy economist with more than 35 years of private and public sector experience in the electric and natural gas industries. He has extensive experience analyzing utility rate filings and resource plans with particular focus on fuel and power supply requirements, quality of fuel supply management, and reasonableness of energy costs. Mr. Nalepa developed peak demand and energy forecasts for public utilities and has forecast the price of natural gas in ratemaking and resource plan evaluations. He led a management and performance review of the Texas Public Utility Commission, and has conducted performance reviews and valuation studies of municipal utility systems. Mr. Nalepa previously directed the Railroad Commission of Texas' Regulatory Analysis & Policy Section, with responsibility for preparing timely natural gas industry analysis, managing ratemaking proceedings, mediating informal complaints, and overseeing consumer complaint resolution. He has prepared and defended expert testimony in both administrative and civil proceedings, and has served as a technical examiner in natural gas rate proceedings.

### **EDUCATION**

- 1998           Certificate of Mediation  
                  Dispute Resolution Center, Austin
- 1989           NARUC Regulatory Studies Program  
                  Michigan State University
- 1988           M.S. - Petroleum Engineering  
                  University of Houston
- 1980           B.S. - Mineral Economics  
                  Pennsylvania State University

### **PROFESSIONAL HISTORY**

- 2011 -           ReSolved Energy Consulting  
                  Partner
- 2003 - 2011   RJ Covington Consulting  
                  Managing Director
- 1997 – 2003   Railroad Commission of Texas  
                  Asst. Director, Regulatory Analysis & Policy
- 1995 – 1997   Karl J. Nalepa Consulting  
                  Principal
- 1992 – 1995   Resource Management International, Inc.  
                  Supervising Consultant
- 1988 – 1992   Public Utility Commission of Texas  
                  Fuels Analyst
- 1980 – 1988   Transco Exploration Company  
                  Reservoir and Evaluation Engineer

## **AREAS OF EXPERTISE**

### **Regulatory Analysis**

*Electric Power:* Analyzed electric utility rate, certification, and resource forecast filings. Assessed the quality of fuel supply management, and reasonableness of fuel costs recovered from ratepayers. Projected the cost of fuel and purchased power. Estimated the impact of environmental costs on utility resource selection. Participated in regulatory rulemaking activities. Provided expert staff testimony in a number of proceedings before the Texas Public Utility Commission.

As consultant, represent interests of municipal clients intervening in large utility rate proceedings through analysis of filings and presentation of testimony before the Public Utility Commission. Also assist municipal utilities in preparing and defending requests to change rates and other regulatory matters before the Public Utility Commission.

*Natural Gas:* Directed the economic regulation of gas utilities in Texas for the Railroad Commission of Texas. Responsible for monitoring, analyzing and reporting on conditions and events in the natural gas industry. Managed Commission staff representing the public interest in contested rate proceedings before the Railroad Commission, and acted as technical examiner on behalf of the Commission. Mediated informal disputes between industry participants and directed handling of customer billing and service complaints. Oversaw utility compliance filings and staff rulemaking initiatives. Served as a policy advisor to the Commissioners.

As consultant, represent interests of municipal clients intervening in large utility rate proceedings through analysis of filings and presentation of testimony before the cities and Railroad Commission. Also assist small utilities in preparing and defending requests to change rates and other regulatory matters before the Railroad Commission.

### **Litigation Support**

Retained to support litigation in natural gas contract disputes. Analyzed the results of contract negotiations and competitiveness of gas supply proposals considering gas market conditions contemporaneous with the period reviewed. Supported litigation related to alleged price discrimination related to natural gas sales for regulated customers. Provided analysis of regulatory and accounting issues related to ownership of certain natural gas distribution assets in support of litigation against a natural gas utility. Supported independent power supplier in binding arbitration regarding proper interpretation of a natural gas transportation contract. Provided expert witness testimony in administrative and civil court proceedings.

## **Utility System Assessment**

Led a management and performance review of the Public Utility Commission. Conducted performance reviews and valuation studies of municipal utility systems. Assessed ability to compete in the marketplace, and recommended specific actions to improve the competitive position of the utilities. Provided comprehensive support in the potential sale of a municipal gas system, including preparation of a valuation study and all activities leading to negotiation of contract for sale and franchise agreements.

## **Energy Supply Analysis**

Reviewed system requirements and prepared requests for proposals (RFPs) to obtain natural gas and power supplies for both utility and non-utility clients. Evaluated submittals under alternative demand and market conditions, and recommended cost-effective supply proposals. Assessed supply strategies to determine optimum mix of available resources.

## **Econometric Forecasting**

Prepared econometric forecasts of peak demand and energy for municipal and electric cooperative utilities in support of system planning activities. Developed forecasts at the rate class and substation levels. Projected price of natural gas by individual supplier for Texas electric and natural gas utilities to support review of utility resource plans.

## **Reservoir Engineering**

Managed certain reserves for a petroleum exploration and production company in Texas. Responsible for field surveillance of producing oil and natural gas properties, including reserve estimation, production forecasting, regulatory reporting, and performance optimization. Performed evaluations of oil and natural gas exploration prospects in Texas and Louisiana.

## **PROFESSIONAL MEMBERSHIPS**

Society of Petroleum Engineers  
International Association for Energy Economics  
United States Association for Energy Economics

## SELECT PUBLICATIONS, PRESENTATIONS, AND TESTIMONY

- “Summary of the USAEE Central Texas Chapter’s Workshop entitled ‘EPA’s Proposed Clean Power Plan Rules: Economic Modeling and Effects on the Electric Reliability of Texas Region,’” with Dr. Jay Zarnikau and Mr. Neil McAndrews, USAEE Dialogue, May 2015
- “Public Utility Ratemaking,” EBF 401: Strategic Corporate Finance, The Pennsylvania State University, September 2013
- “What You Should Know About Public Utilities,” EBF 401: Strategic Corporate Finance, The Pennsylvania State University, October 2011
- “Natural Gas Markets and the Impact on Electricity Prices in ERCOT,” Texas Coalition of Cities for Fair Utility Issues, Dallas, October 2008
- “Natural Gas Regulatory Policy in Texas,” Hungarian Oil and Gas Policy Business Colloquium, U.S. Trade and Development Agency, Houston, May 2003
- “Railroad Commission Update,” Texas Society of Certified Public Accountants, Austin, April 2003
- “Gas Utility Update,” Railroad Commission Regulatory Expo and Open House, October 2002
- “Deregulation: A Work in Progress,” Interview by Karen Stidger, *Gas Utility Manager*, October 2002
- “Regulatory Overview: An Industry Perspective,” Southern Gas Association’s Ratemaking Process Seminar, Houston, February 2001
- “Natural Gas Prices Could Get Squeezed,” with Commissioner Charles R. Matthews, *Natural Gas*, December 2000
- “Railroad Commission Update,” Texas Society of Certified Public Accountants, Austin, April 2000
- “A New Approach to Electronic Tariff Access,” Association of Texas Intrastate Natural Gas Pipeline Annual Meeting, Houston, January 1999
- “A Texas Natural Gas Model,” United States Association for Energy Economics North American Conference, Albuquerque, 1998
- “Texas Railroad Commission Aiding Gas Industry by Updated Systems, Regulations,” *Natural Gas*, July 1998
- “Current Trends in Texas Natural Gas Regulation,” Natural Gas Producers Association, Midland, 1998
- “An Overview of the American Petroleum Industry,” Institute of International Education Training Program, Austin, 1993
- Direct testimony in PUC Docket No. 10400 summarized in *Environmental Externality*, Energy Research Group for the Edison Electric Institute, 1992
- “God’s Fuel - Natural Gas Exploration, Production, Transportation and Regulation,” with Danny Bivens, Public Utility Commission of Texas Staff Seminar, 1992
- “A Summary of Utilities’ Positions Regarding the Clean Air Act Amendments of 1990,” Industrial Energy Technology Conference, Houston, 1992
- “The Clean Air Act Amendments of 1990,” Public Utility Commission of Texas Staff Seminar, 1992

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ATTACHMENT B

SUMMARY OF PREVIOUSLY FILED TESTIMONY

**KARL J. NALEPA  
TESTIMONY FILED**

<b>DKT NO.</b>	<b>DATE</b>	<b>REPRESENTING</b>	<b>UTILITY</b>	<b>PHASE</b>	<b>ISSUES</b>
<u>Before the Public Utility Commission of Texas</u>					
51381	Dec 20	Entergy Cities	Entergy Texas Inc.	GCRR	GCRR Methodology
51345	Oct 20	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate
51215	Mar 21	Office of Public Counsel	Entergy Texas Inc.	CCN	Public Interest Review
51100	Nov 20	Office of Public Counsel	Lubbock Power & Light	TCOS	Wholesale Transmission Rate
50997	Jan 21	CARD	SWEPSCO	Fuel Reconciliation	Fuel Cost Recovery
50790	Jul 20	Office of Public Counsel	Entergy Texas, Inc.	Sale, Transfer, Merger	Public Interest Review
50714	May 20	Cities	Entergy Texas Inc.	DCRF	DCRF Methodology
50110	Dec 19	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate
49831	Feb 20	Xcel Municipalities	Southwestern Public Service	Cost of Service	Cost of Service
49737	Jan 20	Office of Public Counsel	SWEPSCO	CCN	Public Interest Review
49594	Jul 19	Oncor Cities	Oncor Electric Delivery	EECRF	EECRF Methodology
49592	Jul 19	AEP Cities	AEP Texas Inc.	EECRF	EECRF Methodology
49586	Jul 19	TNMP Cities	Texas-New Mexico Power	EECRF	EECRF Methodology
49583	Aug 19	Gulf Coast Coalition	CenterPoint Energy Houston	EECRF	EECRF Methodology
49496	Jun 19	City of El Paso	El Paso Electric	EECRF	EECRF Methodology
49494	Jul 19	AEP Cities	AEP Texas Inc.	Cost of Service	Plant Additions
49421	Jun 19	Office of Public Counsel	CenterPoint Energy Houston	Cost of Service	Cost of Service
49395	May 19	City of El Paso	El Paso Electric	DCRF	DCRF Methodology



<b>DKT NO.</b>	<b>DATE</b>	<b>REPRESENTING</b>	<b>UTILITY</b>	<b>PHASE</b>	<b>ISSUES</b>
49148	Apr 19	City of El Paso	El Paso Electric	TCRF	TCRF Methodology
49042	Mar 19	SWEPCO Cities	SWEPCO	TCRF	TCRF Methodology
49041	Feb 19	SWEPCO Cities	SWEPCO	DCRF	DCRF Methodology
48973	May 19	Xcel Municipalities	Southwestern Public Service	Fuel Reconciliation	Fuel / Purch Power Costs
48963	Dec 18	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate
48420	Aug 18	Gulf Coast Coalition	CenterPoint Energy Houston	EECRF	EECRF Methodology
48404	Jul 18	Cities	Texas-New Mexico Power	EECRF	EECRF Methodology
48371	Aug 18	Cities	Entergy Texas Inc.	Cost of Service	Cost of Service
48231	May 18	Cities	Oncor Electric Delivery	DCRF	DCRF Methodology
48226	May 18	Gulf Coast Coalition	CenterPoint Energy Houston	DCRF	DCRF Methodology
48222	Apr 18	Cities	AEP Texas Inc.	DCRF	DCRF Methodology
47900	Dec 17	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate
47527	Apr 18	Xcel Municipalities	Southwestern Public Service	Cost of Service	Cost of Service
47461	Dec 17	Office of Public Counsel	SWEPCO	CCN	Public Interest Review
47236	Jul 17	Cities	AEP Texas	EECRF	EECRF Methodology
47235	Jul 17	Cities	Oncor Electric Delivery	EECRF	EECRF Methodology
47217	Jul 17	Cities	Texas-New Mexico Power	EECRF	EECRF Methodology
47032	May 17	Gulf Coast Coalition	CenterPoint Energy Houston	DCRF	DCRF Methodology
46936	Oct 17	Xcel Municipalities	Southwestern Public Service	CCN	Public Interest Review
46449	Apr 17	Cities	SWEPCO	Cost of Service	Cost of Service
46348	Sep 16	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate

<b>DKT NO.</b>	<b>DATE</b>	<b>REPRESENTING</b>	<b>UTILITY</b>	<b>PHASE</b>	<b>ISSUES</b>
46238	Jan 17	Office of Public Counsel	Oncor Electric Delivery	STM	Public Interest Review
46076	Dec 16	Cities	Entergy Texas Inc.	Fuel Reconciliation	Fuel Cost
46050	Aug 16	Cities	AEP Texas	STM	Public Interest Review
46014	Jul 16	Gulf Coast Coalition	CenterPoint Energy Houston	EECRF	EECRF Methodology
45788	May 16	Cities	AEP-TNC	DCRF	DCRF Methodology
45787	May 16	Cities	AEP-TCC	DCRF	DCRF Methodology
45747	May 16	Gulf Coast Coalition	CenterPoint Energy Houston	DCRF	DCRF Methodology
45712	Apr 16	Cities	SWEPCO	DCRF	DCRF Methodology
45691	Jun 16	Cities	SWEPCO	TCRF	TCRF Methodology
45414	Feb 17	Office of Public Counsel	Sharyland	Cost of Service	Cost of Service
45248	May 16	City of Fritch	City of Fritch	Cost of Service (water)	Cost of Service
45084	Nov 15	Cities	Entergy Texas Inc.	TCRF	TCRF Methodology
45083	Oct 15	Cities	Entergy Texas Inc.	DCRF	DCRF Methodology
45071	Aug 15	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate
44941	Dec 15	City of El Paso	El Paso Electric	Cost of Service	CEP Adjustments
44677	Jul 15	City of El Paso	El Paso Electric	EECRF	EECRF Methodology
44572	May 15	Gulf Coast Coalition	CenterPoint Energy Houston	DCRF	DCRF Methodology
44060	May 15	City of Frisco	Brazos Electric Coop	CCN	Transmission Cost Recovery
43695	May 15	Pioneer Natural Resources	Southwestern Public Service	Cost of Service	Cost Allocation
43111	Oct 14	Cities	Entergy Texas Inc.	DCRF	DCRF Methodology
42770	Aug 14	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate

<b>DKT NO.</b>	<b>DATE</b>	<b>REPRESENTING</b>	<b>UTILITY</b>	<b>PHASE</b>	<b>ISSUES</b>
42485	Jul 14	Cities	Entergy Texas Inc.	EECRF	EECRF Methodology
42449	Jul 14	City of El Paso	El Paso Electric	EECRF	EECRF Methodology
42448	Jul 14	Cities	SWEPSCO	TCRF	Transmission Cost Recovery Factor
42370	Dec 14	Cities	SWEPSCO	Rate Case Expenses	Rate Case Expenses
41791	Jan 14	Cities	Entergy Texas Inc.	Cost of Service	Cost of Service/Fuel
41539	Jul 13	Cities	AEP Texas North	EECRF	EECRF Methodology
41538	Jul 13	Cities	AEP Texas Central	EECRF	EECRF Methodology
41444	Jul 13	Cities	Entergy Texas Inc.	EECRF	EECRF Methodology
41223	Apr 13	Cities	Entergy Texas Inc.	ITC Transfer	Public Interest Review
40627	Nov 12	Austin Energy	Austin Energy	Cost of Service	General Fund Transfers
40443	Dec 12	Office of Public Counsel	SWEPSCO	Cost of Service	Cost of Service/Fuel
40346	Jul 12	Cities	Entergy Texas Inc.	Join MISO	Public Interest Review
39896	Mar 12	Cities	Entergy Texas Inc.	Cost of Service/ Fuel Reconciliation	Cost of Service/ Nat Gas/ Purch Power
39366	Jul 11	Cities	Entergy Texas Inc.	EECRF	EECRF Methodology
38951	Feb 12	Cities	Entergy Texas Inc.	CGS Tariff	CGS Costs
38815	Sep 10	Denton Municipal Electric	Denton Municipal Electric	Interim TCOS	Wholesale Transmission Rate
38480	Nov 10	Cities	Texas-New Mexico Power	Cost of Service	Cost of Service/Rate Design
37744	Jun 10	Cities	Entergy Texas Inc.	Cost of Service/ Fuel Reconciliation	Cost of Service/ Nat Gas/ Purch Power/ Gen
37580	Dec 09	Cities	Entergy Texas Inc.	Fuel Refund	Fuel Refund Methodology
36956	Jul 09	Cities	Entergy Texas Inc.	EECRF	EECRF Methodology

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36392	Nov 08	Texas Municipal Power	Texas Municipal Power	Interim TCOS	Wholesale Transmission Rate
35717	Nov 08	Cities Steering Committee	Oncor Electric Delivery	Cost of Service	Cost of Service/Rate Design
34800	Apr 08	Cities	Entergy Gulf States	Fuel Reconciliation	Natural Gas/Coal/Nuclear
16705	May 97	North Star Steel	Entergy Gulf States	Fuel Reconciliation	Natural Gas/Fuel Oil
10694	Jan 92	PUC Staff	Midwest Electric Coop	Revenue Requirements	Depreciation/ Quality of Service
10473	Sep 91	PUC Staff	HL&P	Notice of Intent	Environmental Costs
10400	Aug 91	PUC Staff	TU Electric	Notice of Intent	Environmental Costs
10092	Mar 91	PUC Staff	HL&P	Fuel Reconciliation	Natural Gas/Fuel Oil
10035	Jun 91	PUC Staff	West Texas Utilities	Fuel Reconciliation Fuel Factor	Natural Gas Natural Gas/Fuel Oil/Coal
9850	Feb 91	PUC Staff	HL&P	Revenue Req. Fuel Factor	Natural Gas/Fuel Oil/ETSI Natural Gas/Coal/Lignite
9561	Aug 90	PUC Staff	Central Power & Light	Fuel Reconciliation Revenue Requirements Fuel Factor	Natural Gas Natural Gas/Fuel Oil Natural Gas
9427	Jul 90	PUC Staff	LCRA	Fuel Factor	Natural Gas
9165	Feb 90	PUC Staff	El Paso Electric	Revenue Requirements Fuel Factor	Natural Gas/Fuel Oil Natural Gas
8900	Jan 90	PUC Staff	SWEPCO	Fuel Reconciliation Fuel Factor	Natural Gas Natural Gas
8702	Sep 89 Jul 89	PUC Staff	Gulf States Utilities	Fuel Reconciliation Revenue Requirements Fuel Factor	Natural Gas/Fuel Oil Natural Gas/Fuel Oil Natural Gas/Fuel Oil
8646	May 89 Jun 89	PUC Staff	Central Power & Light	Fuel Reconciliation Revenue Requirements Fuel Factor	Natural Gas Natural Gas/Fuel Oil Natural Gas

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8588	Aug 89	PUC Staff	El Paso Electric	Fuel Reconciliation	Natural Gas
<u>Before the Railroad Commission of Texas</u>					
05509	Dec 20	LDC, LLC	LDC, LLC	Cost of Service	Cost of Service/Rate Design
10928	Mar 20	TGS Cities	Texas Gas Service	Cost of Service	Cost of Service/Rate Design
10920	Feb 20	East Texas Cities Coalition	CenterPoint Energy Entex	Cost of Service	Cost of Service/Rate Design
10900	Nov 19	Cities Steering Committee	Atmos Energy Triangle	Cost of Service	Cost of Service
10899	Sep 19	NatGas, Inc.	NatGas, Inc.	Cost of Service	Cost of Service/Rate Design
10737	Jun 18	T&L Gas Co.	T&L Gas Co.	Cost of Service	Cost of Service/Rate Design
10622	Apr 17	LDC, LLC	LDC, LLC	Cost of Service	Cost of Service/Rate Design
10617	Mar 17	Onalaska Water & Gas	Onalaska Water & Gas	Cost of Service	Cost of Service/Rate Design
10580	Mar 17	Cities Steering Committee	Atmos Pipeline Texas	Cost of Service	Cost of Service/Rate Design
10567	Feb 17	Gulf Coast Coalition	CenterPoint Energy Entex	Cost of Service	Cost of Service/Rate Design
10506	Jun 16	City of El Paso	Texas Gas Service	Cost of Service	Cost of Service/Energy Efficiency
10498	Feb 16	NatGas, Inc.	NatGas, Inc.	Cost of Service	Cost of Service/Rate Design
10359	Jul 14	Cities Steering Committee	Atmos Energy Mid Tex	Cost of Service	Cost of Service/Rate Design
10295	Oct 13	Cities Steering Committee	Atmos Pipeline Texas	Revenue Rider	Rider Renewal
10242	Jan 13	Onalaska Water & Gas	Onalaska Water & Gas	Cost of Service	Cost of Service/Rate Design
10196	Jul 12	Bluebonnet Natural Gas	Bluebonnet Natural Gas	Cost of Service	Cost of Service/Rate Design
10190	Jan 13	City of Magnolia, Texas	Hughes Natural Gas	Cost of Service	Cost of Service/Rate Design
10174	Aug 12	Cities Steering Committee	Atmos Energy West Texas	Cost of Service	Cost of Service/Rate Design
10170	Aug 12	Cities Steering Committee	Atmos Energy Mid Tex	Cost of Service	Cost of Service/Rate Design

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10106	Oct 11	Gulf Coast Coalition	CenterPoint Energy Entex	Cost of Service	Cost of Service/Rate Design
10083	Aug 11	City of Magnolia, Texas	Hughes Natural Gas	Cost of Service	Cost of Service/Rate Design
10038	Feb 11	Gulf Coast Coalition	CenterPoint Energy Entex	Cost of Service	Cost of Service/Rate Design
10021	Oct 10	AgriTex Gas, Inc.	AgriTex Gas, Inc.	Cost of Service	Cost of Service/Rate Design
10000	Dec 10	Cities Steering Committee	Atmos Pipeline Texas	Cost of Service	Cost of Service/Rate Design
9902	Oct 09	Gulf Coast Coalition	CenterPoint Energy Entex	Cost of Service	Cost of Service/Rate Design
9810	Jul 08	Bluebonnet Natural Gas	Bluebonnet Natural Gas	Cost of Service	Cost of Service/Rate Design
9797	Apr 08	Universal Natural Gas	Universal Natural Gas	Cost of Service	Cost of Service/Rate Design
9732	Jul 08	Cities Steering Committee	Atmos Energy Corp.	Gas Cost Review	Natural Gas Costs
9670	Oct 06	Cities Steering Committee	Atmos Energy Corp.	Cost of Service	Affiliate Transactions/ O&M Expenses/GRIP
9667	Nov 06	Oneok Westex Transmission	Oneok Westex Transmission	Abandonment	Abandonment
9598	Sep 05	Cities Steering Committee	Atmos Energy Corp.	GRIP Appeal	GRIP Calculation
9530	Apr 05	Cities Steering Committee	Atmos Energy Corp.	Gas Cost Review	Natural Gas Costs
9400	Dec 03	Cities Steering Committee	TXU Gas Company	Cost of Service O&M Expenses/Capital Costs	Affiliate Transactions/

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<u>Before the Louisiana Public Service Commission</u>					
U-35359	Feb 20 Nov 20	PSC Staff	Dixie Electric Membership Corporation	Cost of Service	Cost of Service / FRP Renewal / AMS Certification Stipulation
U-34344/ U-34717	Apr 18	PSC Staff	Dixie Electric Member Corporation	Formula Rate Plan	Stipulation
U-34344	Jan 18	PSC Staff	Dixie Electric Member Corporation	Formula Rate Plan	Adjusted Revenues
U-33633	Nov 15	PSC Staff Entergy Gulf States Louisiana	Entergy Louisiana, LLC/	Resource Certification	Prudence
U-33033	Jul 14	PSC Staff Entergy Gulf States Louisiana	Entergy Louisiana, LLC/	Resource Certification	Revenue Requirement
U-31971	Nov 11	PSC Staff Entergy Gulf States Louisiana	Entergy Louisiana, LLC/	Resource Certification	Certification/Cost Recovery
<u>Before the Arkansas Public Service Commission</u>					
O7-105-U	Mar 08	Arkansas Customers & pipelines serving CenterPoint	CenterPoint Energy, Inc.	Gas Cost Complaint	Prudence / Cost Recovery
<u>Before the Colorado Public Utilities Commission</u>					
18A-0791E	Mar 19	Pueblo County	Black Hills Colorado Electric	Economic Development Rate	Tariff Issues

SOAH DOCKET NO. 473-21-0538  
PUC DOCKET NO. 51415

APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE  
ELECTRIC POWER COMPANY FOR § OF  
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

DIRECT TESTIMONY AND ATTACHMENTS OF

KARL J. NALEPA

WORKPAPERS

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