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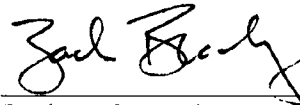
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APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE  
§  
§  
PUBLIC SERVICE COMPANY FOR § OF  
§  
§  
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

**CROSS REBUTTAL TESTIMONY OF EVAN D. EVANS  
ON BEHALF OF TEXAS COTTON GINNERS' ASSOCIATION**

Evan D. Evans, files this, his Cross Rebuttal Testimony, on behalf of Texas Cotton Ginnners' Association. Evan D. Evans stipulates that this Cross Rebuttal Testimony can be treated by all parties as if the answers were filed under oath.

Respectfully submitted,  
**BRADY & HAMILTON, LLP**

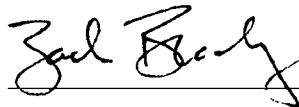


Zachary S. Brady  
State Bar No. 24012320  
*zach@bhlawgroup.com*  
Laura A. W. Pratt  
State Bar No. 24072287  
*laura@bhlawgroup.com*  
1602 13<sup>th</sup> Street  
Lubbock, Texas 79401  
Telephone: (806) 771-1850  
Facsimile: (806) 771-3750

ATTORNEYS FOR INTERVENORS  
TEXAS COTTON GINNERS' ASSOCIATION

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served on all parties known of record via facsimile, U.S. mail, or electronically on this 23<sup>rd</sup> day of April, 2021.

A handwritten signature in black ink, appearing to read "Zach Brady", is written over a horizontal line.

Zachary S. Brady

**SOAH DOCKET NO. 473-21-0538**

**PUC DOCKET NO. 51415**

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

**CROSS REBUTTAL TESTIMONY AND EXHIBITS**

**OF**

**EVAN D. EVANS**

**ON BEHALF OF**

**TEXAS COTTON GINNERS' ASSOCIATION**

**April 23, 2021**

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### **LIST OF EXHIBITS**

<b><u>Exhibit</u></b>	<b><u>Description</u></b>
EDE-1	List of Prior Testimony
EDE-2	Historical Market Price of Cotton

**CROSS-REBUTTAL TESTIMONY  
OF  
EVAN D. EVANS**

**I. INTRODUCTION**

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

A. My name is Evan D. Evans. My business address is 17450 Valley Lake Drive, Canyon, Texas 79015.

**Q. Please identify by whom you are employed and in what capacity.**

A. I am a principal and a consultant with Integrity Power Consulting, LLC. Integrity Power Consulting was established in 2003 and it provides consulting services to regulatory commission staffs, government agencies, and retail utility customers and customer groups. Integrity Power Consulting is also a registered electricity broker with the Public Utility Commission of Texas ("PUCT" or "Commission").

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

A. I am filing testimony on behalf of the Texas Cotton Ginners' Association.

**Q. Please summarize your educational and professional background.**

A. I graduated from Texas Tech University with a Bachelor of Business Administration degree in Finance in May 1980.

Upon graduation, I was employed at West Texas Utilities Company, a wholly owned subsidiary of Central and South West Corporation ("CSW"), which was acquired by American Electric Power Company ("AEP") in June 2000. During my 20-year career with CSW and AEP, I held a variety of professional analytical, consultant, and management positions in the rates, regulatory services, load research, and marketing and business development areas.

1           In October 2000, I joined C.H. Guernsey & Company, now known as Guernsey  
2 Associates, which is an employee-owned, professional consulting firm offering engineering,  
3 architectural, economic, and construction management services to utilities, industries, and  
4 government agencies throughout the United States and internationally. While employed with  
5 Guernsey, I managed the firm's Dallas regional office and provided consulting services to  
6 electric utility industry clients in a variety of areas, including regulatory compliance,  
7 integrated resource planning, electric utility cost of service issues, rate studies, financial  
8 analysis, economic feasibility analysis, retail electric choice, and wholesale power supply  
9 contract negotiations.

10           In September 2006, I left Guernsey and accepted the position of Director- Regulatory  
11 Services with El Paso Electric Company ("EPE"). I was promoted to Assistant Vice  
12 President-Regulatory Services and Rates in July 2008. While at EPE, I established the  
13 company's Regulatory Case Management and Energy Efficiency & Utilization departments.  
14 My responsibilities included direction of EPE's Energy Efficiency & Utilization, Economic  
15 & Rate Research, Regulatory Case Management, and Regulatory Accounting departments  
16 and their associated missions.

17           In January 2014, I began my employment with Xcel Energy as Regional Vice  
18 President – Rates and Regulatory Affairs for Southwestern Public Service Company  
19 ("SPS"). In March 2017, I became Director – Regulatory and Pricing Analysis for SPS. My  
20 responsibilities included:

- 21           •       developing and implementing SPS's regulatory program to ensure SPS  
22                   fulfilled all legal and regulatory requirements of the PUCT, the NMPRC, and  
23                   the Federal Energy Regulatory Commission ("FERC");

- directing the development and execution of all regulatory case filings before state commissions and the FERC;
- leading regulatory activities to establish and maintain state and federal commission relationships and overseeing the administration of regulatory rules and procedures; and
- directing the cost allocation and pricing functions for SPS.

In October 2020, I left SPS and began working as a principal and consultant with Integrity Power Consulting.

**Q. Have you testified before this regulatory commission or any other regulatory authorities?**

A. Yes. I have testified in numerous cases or dockets and on a variety of subjects before the Commission, the PUCT, the Georgia Public Service Commission, and the Oklahoma Corporation Commission. I have also submitted testimony before the FERC. A list of prior cases in which I submitted testimony is provided in Exhibit EDE-1.

**Q. What is the purpose of your cross-rebuttal testimony in this case?**

A. In this testimony I will respond to the revenue increase distribution recommendations of PUCT Staff witness, Adrian Narvaez. Specifically, I will address Mr. Narvaez's recommendation for the Commission to implement a process in which all rate classes will be moved to equalized rates of return in multiple-phases and rate classes will experience base rate changes each year for multiple years based on the results of an historic test-year that did not reflect the impacts of the COVID-19 pandemic. I will particularly discuss how Mr. Narvaez's recommendation artfully circumvents the gradualism directive from the Final Order in Docket No. 46449, SWEPCO's previous rate case. Finally, I will describe the



- 1 specific, unique characteristics of the Cotton Gin Service class and how Mr. Narvaez's
- 2 recommendation is not reasonable for the Cotton Gin class.
- 3

1       **II.    STAFF’S PROPOSED MULTI-PHASE REVENUE DISTRIBUTION**

2       **Q.    Please summarize the Staff’s multi-phase revenue distribution recommendation.**

3       A.    Mr. Narvaez, on behalf of Staff, discusses and recommends a multi-phase approach that he  
4           believes reflects gradualism. Staff’s recommended multi-phase approach would move all  
5           classes to equalized rates of return over multiple years based on the results of the class cost  
6           of service study approved in this proceeding. In the first phase, individual classes would be  
7           assigned base revenue increases to move them to equalized rates of return, except the  
8           revenue increases for individual classes, net of changes in TCRF and DCRF revenues, would  
9           be capped at 43%. The amount of revenue that is not recovered due to the 43% cap would be  
10          reallocated proportionally among the other classes within their assigned group of rate classes  
11          that Mr. Narvaez has identified as “rate bundles.” Mr. Narvaez recommends this process  
12          continue each year for up to three more years during which the base rates for classes are  
13          increased up to 43% per year until all classes produce the average rate of return approved in  
14          this rate case.

15       **Q.    Do you agree with Mr. Narvaez that Staff’s recommended multi-phase revenue**  
16       **distribution reflects gradualism?**

17       A.    No, I do not. The Staff’s recommendation is a draconian approach that would require the  
18           Cotton Gin Service and some other classes to endure up to a 43% increase in their base rates  
19           each year for up to four years. Although when compared to the Staff’s recommended total  
20           base rate revenue requirement for SWEPCO, the total amount of dollars associated with the  
21           rate classes that will experience these multi-year increases is relatively small. However,  
22           these increases will severely impact individual customers within these classes.

23       **Q.    What is the basis for Staff’s multi-phase revenue distribution recommendation to move**  
24       **all classes to equalized rates of return?**

1 A. This recommendation is based on Mr. Narvaez's personal interpretation of 16 TAC § 25.234  
2 (a) that he believes "requires that rates be set at cost."<sup>1</sup> In addition, Mr. Narvaez also  
3 believes that cost-based rates are equitable and essential in advancing economic efficiency  
4 and rate stability.<sup>2</sup>

5 **Q. Do you agree with Mr. Narvaez's interpretation of 16 TAC § 25.234 (a)?**

6 A. No, I do not agree with his interpretation. Furthermore, it does not appear the Commission  
7 agrees with his interpretation. That rule, in its present form, was approved almost 22 years  
8 ago, in July 1999. Since this rule was approved, the Commission has issued final orders in  
9 numerous rate cases, both fully litigated and settled, in which revenue increase distributions  
10 were approved that did not move all rate classes to equalized rates of return, but instead have  
11 generally reflected reasonable and gradual movement of the base rate levels for all classes  
12 toward equalized rates of return.

13 The Commission's electric substantive rule 16 TAC § 25.234 (a) states:

14 (a) Rates shall not be unreasonably preferential, prejudicial, or discriminatory, but shall  
15 be sufficient, equitable, and consistent in application to each class of customers, and  
16 ***shall be based on cost. (Emphasis added)***

17 Although the Commission's rule clearly states that rates shall be based on cost, it  
18 does not require "that rates be set at cost" as Mr. Narvaez states.<sup>3</sup> In order for Mr. Narvaez's  
19 interpretation to be correct, you must take the position that the Commission has been  
20 intentionally violating its rule for almost 22 years.

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<sup>1</sup> Direct Testimony of Adrian Narvaez at 12:8-17 (April 7, 2021) (Narvaez Direct)

<sup>2</sup> Narvaez Direct at 22:7-8

<sup>3</sup> Narvaez Direct at 12:7-12.

1 **Q. Does the Public Utility Regulatory Act (“PURA”) require all electric rates to be set at**  
2 **cost?**

3 A. No. PURA §36.203 establishes the statutory definition for just and reasonable rates.  
4 Subsection (b) of this Section states:

5 (b) A rate may not be unreasonably preferential, prejudicial, or discriminatory but must  
6 be sufficient, equitable, and consistent in application to each class of consumer.

7 I do not believe that anything in this Section or anywhere else requires all electric  
8 rates be set at cost.

9 **Q. Is there any precedent at the Commission for Staff’s multi-phase revenue distribution**  
10 **recommendation for electric utilities?**

11 A. No, based on my knowledge and over 40 years of experience in working before the PUCT, I  
12 am not aware of any prior instance in which a multi-phase revenue distribution plan to move  
13 all classes to equalized rates of return was proposed or ordered by the Commission. In  
14 addition, Mr. Narvaez admits that he has no knowledge of a multi-phase revenue distribution  
15 being proposed for any electric utility in the past.<sup>4</sup>

16 Mr. Narvaez’s multi-phase revenue distribution recommendation appears to be driven  
17 by a belief that the Commission is required to move all customer classes to equalized rates of  
18 return based upon the results of the approved class cost allocation study for each rate case  
19 that is based on the circumstances in the associated historical test-year. Gradualism or the  
20 consideration of factors beyond those reflected in an historic, embedded class cost allocation  
21 study is only a temporarily necessary evil.

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<sup>4</sup> Narvaez Direct at 25:16-21

1   **Q.    Was the Commission restricted from implementing a multi-phase revenue distribution**  
2       **approach in Docket No. 46449 or any other case in which it approved gradual**  
3       **movement toward equalized rates of return for customer classes?**

4    A.   No. As Mr. Narvaez testified, his approach is a unique recommendation that appears to be  
5       designed to artfully circumvent the considerations underlying the Commission's approval of  
6       gradualism in Docket No. 46449 and the numerous other rate cases in which all classes were  
7       not moved to equalized rates of return.

8   **Q.    Do you believe that Mr. Narvaez's recommendation to quickly move all rates to**  
9       **equalized rates of return will advance economic efficiency and rate stability?**

10   A.   No, I believe it will have the opposite effect. During the Staff's proposed multi-phase  
11       revenue distribution period, the classes experiencing multi-year increases will experience  
12       drastic changes in their rates for multiple years and all classes within their respective rate  
13       bundle will experience varying levels of instability during those years. Furthermore, for rate  
14       classes, such as Cotton Gin Service, in which usage levels vary significantly between years  
15       and for which there are no normalizing adjustments, significantly increasing rates based  
16       upon the consumption patterns and levels for a single test-year can result in a need for base  
17       rate decreases for those rate classes in future rate cases. Oscillating rates will not promote  
18       rate stability nor economic efficiency.

19   **Q.    Have witnesses for other parties also address the impact of revenue distribution and the**  
20       **need for gradualism for some rate classes?**

21   A.   Yes, in the Direct Testimony of Kit Pevoto on behalf of East Texas Salt Water Disposal  
22       Company and East Texas Oil and Gas Producers, Ms. Pevoto discusses the impact on  
23       customers in the Oilfield rate classes and she recommends that rate moderation should be

1 used to mitigate rate shock. She also states that she believes SWEPCO's proposed rate  
2 moderation method is reasonable and should be used to determine base rate revenue  
3 requirement distribution among Texas rate classes.<sup>5</sup>

4 In addition, in the Direct Testimony and Exhibits of James W. Daniel on Behalf of  
5 Nucor Steel Longview, LLC, Mr. Daniels discusses his position that inter-class subsidies  
6 should be eliminated in general and, except for three small rate classes, all rate classes'  
7 revenues should be set equal to their cost of service. The three small rate classes Mr. Daniel  
8 identified are Cotton Gin Service, Oilfield Secondary Service, and Public Street and  
9 Highway Lighting Service. For Cotton Gin Service and the other two classes, Mr. Daniel  
10 recommends the large rate increases be limited and that gradualism should be applied. He  
11 recommends the base rate revenue increases for these three rate classes should be limited to  
12 1.5 times the average SWEPCO percent increase of 24.96%, or 37.44%.<sup>6</sup> Mr. Daniel's  
13 recommendation is of note, because under his recommendation, his client, Nucor Steel of  
14 Longview would bear some of the impact of limiting the rate increases assigned to these  
15 three rate classes.  
16

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<sup>5</sup> Direct Testimony of Kit Pevoto at 5:14-16 (March 31, 2021)

<sup>6</sup> Direct Testimony and Exhibits of James W. Daniel at 16:1-23 (March 31, 2021)

1     **III.     IMPACTS OF STAFF’S RECOMMENDATION ON THE COTTON GIN**  
2                                   **SERVICE CLASS**

3     **Q.     Please discuss the impact of Staff’s recommended revenue distribution on customers in**  
4             **SWEPCO’s Cotton Gin Service class.**

5     A.     The Staff’s proposed revenue distribution approach would have a severe impact on the  
6             Cotton Gin class. The consumption levels and patterns of Cotton Gin Service customers are  
7             driven by the quantity of cotton harvested by cotton growers in their respective areas. The  
8             quantity of cotton grown and harvested in a specific area during a growing season is driven  
9             by weather in that area and the prevailing market price for cotton. Both weather and the  
10            market price for cotton are highly variable, consequently the quantity of cotton grown,  
11            harvested, and ginned in specific areas can also vary significantly between years.

12            As a result of the variations in the quantity of cotton ginned, which is measured in  
13            bales, the energy consumption between years can vary significantly. Due to the fact that  
14            SWEPCO’s current Cotton Gin Service rate only includes a customer charge and a  
15            seasonally differentiated kWh charge, significant variations in energy consumption between  
16            years will cause the amount of base rate revenues from the Cotton Gin Service class to vary  
17            significantly between years. Consequently, imposing a high base rate increase in multiple  
18            years on SWEPCO’s Cotton Gin Service class based on a low ginning season, will cause  
19            Cotton Gin Service revenues and the rate of return for the class to increase dramatically in  
20            years with average or above average ginning. The cotton ginning season incorporated in  
21            SWEPCO’s test-year was a low ginning season.

22     **Q.     You mentioned that the prevailing market price for cotton is a major driver in the**  
23             **quantity of cotton that is grown and ginned and that market price is highly variable.**

1       **What information can you produce that illustrates the variability in the market price of**  
2       **cotton?**

3    A.    Exhibit EDE-2 contains a graph of the daily market prices for cotton from July 1, 2015, the  
4           first day of the test-year for SWEPCO's previous Texas retail base rate case, through April  
5           21, 2021. This graph clearly shows the market price of cotton has experienced significant  
6           variability.

7    **Q.    Please describe SWEPCO's Cotton Gin Service customers and their consumption**  
8       **patterns.**

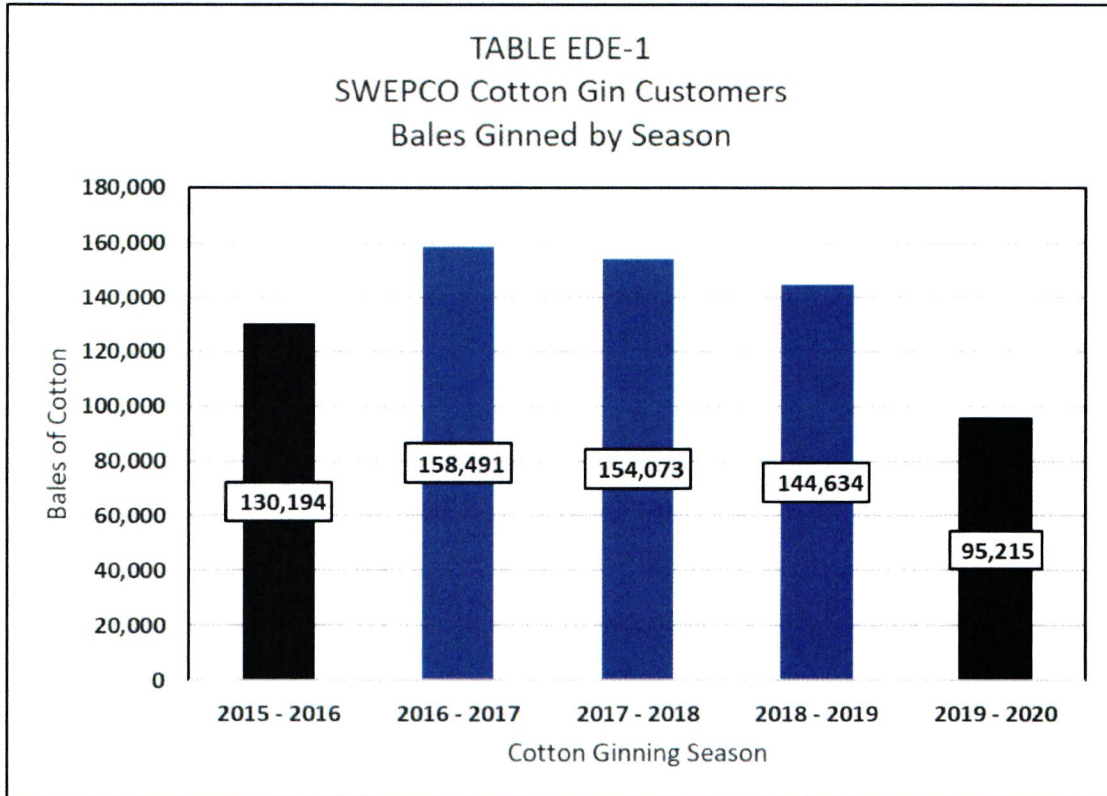
9    A.    SWEPCO's Cotton Gin Service is comprised of five cotton gins located in five rural counties  
10          in the southeast corner of the Texas Panhandle. This section of SWEPCO's Texas service  
11          territory is over 300 miles WNW of the rest of SWEPCO's Texas service territory. The  
12          ginning season for these customers occurs during the autumn and winter months and  
13          generally runs from mid-October to early February each year. During the spring and  
14          summer months, their consumption is very low. During those months, their average  
15          consumption per cotton gin is less than 300 kWh per month. Therefore, the peak  
16          consumption and demands for the Cotton Gin Service class occurs outside of the four peak  
17          summer months for SWEPCO's generation and transmission facilities.

18   **Q.    Do you have any information showing the variation in the amounts of cotton ginned**  
19       **between ginning seasons?**

20   A.    Yes, the graph contained in Table EDE-1 below shows the number of cotton bales ginned by  
21          ginning season beginning with the season included in the test-year for SWEPCO's previous  
22          rate case, Docket No. 46449, and the season included in the current test-year. This graph  
23          shows the quantity of cotton ginned per season can vary significantly. In addition, the graph



1 also reveals the very low quantity of cotton ginned during the test-year when compared to  
2 the previous test-year and it is more apparent when comparing to the three ginning seasons  
3 between the two rate cases.



4  
5 **Q. Have you also compared the kWh usage for the Cotton Gin Service class between**  
6 **Docket No. 46449 and this test-year?**

7 **A.** Yes. The annual billing kWh for the Cotton Gin Service class in this test-year was 5,234,123.  
8 In comparison the billing kWh in Docket No. 46449 was 6,505,400 kWh, or 1,271,277  
9 (24.3%) higher. Also, since Table EDE-1 reveals that the number of cotton bales ginned  
10 during the three years between the two rate cases were between 49,419 bales (51.9%) and  
11 63,215 bales (66.5%) higher than the test-year, the consumption during those years would  
12 have been drastically higher than the test-year. Due to the fact the Cotton Gin Service rate

1 only includes monthly customer charges and kWh charges, the revenues would also be  
2 drastically higher in future years, if the consumption levels are more comparable to the four  
3 years prior to the test-year.

4 **Q. Does the increased kWh consumption also correlate into comparable higher demands**  
5 **and demand allocation percentages?**

6 A. No. Although the consumption during the current test-year was 24.3% lower than the  
7 previous test-year, the annual class peak demand (MDD) at generation, which is used to  
8 allocate distribution plant among classes, was essentially equal for the current test-year  
9 (5,207 kW) and for Docket No. 46449 (5,197 kW). Furthermore, since the ginning season  
10 occurs outside the four peak summer months, the 4 coincident peak ("CP") demands at  
11 generation for Cotton Gin Service during the current test-year was only 5 kW and was only  
12 2.75 kW in Docket No. 46449. The 4 CP demands at generation is a major factor in the  
13 allocation of non-fuel production and transmission costs. Consequently, increased ginning  
14 and the associated increased consumption and revenues from Cotton Gin customers would  
15 not be expected to result in an increase in base rate costs allocated to the Cotton Gin Service  
16 class. Therefore, the rate of return earned from the Cotton Gin Service class will be  
17 significantly higher during average and above average ginning years.

18 **Q. Are there other unique attributes of the Cotton Gin service class that should be**  
19 **considered in assigning a proposed base rate increase to this class?**

20 A. Yes, a majority of the base rate cost of service at equalized for the Cotton Gin Service class  
21 is for Distribution Primary and Distribution Secondary related costs. However, the annual  
22 class peak demand, or MDD, for the Cotton Gin Service class for the test-year occurred in  
23 December and typically occurs in the months of November through December. Distribution

1 Primary and Distribution Secondary costs are allocated among customer classes based on  
2 annual class peak demands. Electric utilities design and construct their distribution systems  
3 and facilities to serve the forecasted annual peak loads for those systems and facilities. For  
4 investor-owned utilities in Texas, it is very rare for distribution substations, primary lines,  
5 and secondary lines to peak in the winter months. In addition, due to the lower ambient  
6 temperatures and higher typical wind speeds, distribution substations, conductors and line  
7 transformers can typically carry more load during winter months without approaching their  
8 peak operating temperature ratings than they can during the summer months. This is  
9 particularly true for the Texas Panhandle where the difference between the average daily  
10 temperatures and the average wind speeds for winter months compared to the summer  
11 months can be quite substantial.

12 In addition, the Cotton Gin Service class has been allocated a substantial amount of  
13 investment and costs associated with distribution secondary poles, lines, underground  
14 conduit and conductor within the class cost of service studies. However, customers with  
15 larger loads that are served at secondary voltages, such as the Cotton Gin Service class, are  
16 typically directly from the line transformer and not served through secondary lines. In  
17 addition, it is unusual for rural loads, such as cotton gins, to be served through underground  
18 secondary conduit and conductor.

19 The Staff's class cost allocation study and their recommended multi-phase revenue  
20 distribution did not take these factors into consideration or provide any credit for the fact the  
21 cotton gins operate during winter months and have a reduced impact on the peak loads of  
22 SWEPCO's distribution system and facilities.

1                                    **IV.    RECOMMENDATIONS AND CONCLUSION**

2    **Q.    What is your recommendation concerning the Staff's proposed multi-phase revenue**  
3           **distribution?**

4    A.    The Staff's proposal should be rejected. It is inappropriate and unprecedented. This approach  
5           would cause less stability in rates and would require the Cotton Gin Service class and other  
6           classes to incur large rate increases each year for multiple years based upon costs and usage  
7           characteristics from a single, historical test-year. In addition, due to the fact that the  
8           consumption for the Cotton Gin Service was very low during the test-year, the inordinately  
9           large base rate increase recommended by the Staff, would lead to the Cotton Gin Service  
10          class producing high rates of return during years that included average or above average  
11          cotton ginning seasons.

12                I recommend the Commission implement a rate moderation method comparable to  
13                that proposed by SWEPCO. It is reasonable and should be used to determine the base rate  
14                revenue increase distribution among SWEPCO's Texas rate classes.

15   **Q.    Does this conclude your cross-rebuttal testimony?**

16   A.    Yes, it does.

List of Prior Testimony  
Filed by Evan D. Evans

Year	Regulatory Commission	Docket/Case Number	Description of Proceeding	Party on Behalf Testimony was Submitted
1983	Public Utilities Commission of Texas (PUCT)	5204	Application of West Texas Utilities Company (WTU) for Authority to Change Rates	WTU
1990	PUCT	9561	Application of Central Power and Light Company (CPL) for Authority to Change Rates	CPL
1992	PUCT	10818	Application of WTU for Approval of Calculation of House Bill 11 Tax Adjustment Factors for 1992	WTU
1994	PUCT	11630	Application of WTU for Approval of Calculation of House Bill 11 Tax Adjustment Factors for 1993	WTU
1995	PUCT	13369	Application of WTU for Authority to Change Rates and Reconcile Fuel costs	WTU
1997	PUCT	17160	Application of WTU for Authority to Increase Fuel Factors and to Implement an Interim Surcharge of Fuel Cost Under-Recoveries	WTU
1997	Corporation Commission of Oklahoma (OCC)	PUD 960000214	Application of the Public Utility Division of the OCC to Review the Rates and Charges of Public Service Company of Oklahoma (PSO)	PSO
1997	PUCT	16995	Joint Application of CPL, WTU, Southwestern Electric Power Company (SWEPCO) for Approval of Preliminary Integrated Resource Plans	CPL, WTU and SWEPCO
1997	PUCT	18607	Application of WTU for Authority to Reconcile Fuel Costs	WTU
1998	PUCT	18970	Application of WTU for Authority to Increase Fuel Factors and to Implement an Interim Surcharge of Fuel Cost Under-Recoveries	WTU
1998	OCC	PUD 980000210	Application of PSO for Temporary Oil Pumping Rider for Marginal Producing Oil Wells	PSO
1998	PUCT	19502	Application of CPL for Approval of A New Interruptible Service Tariff	CPL
2004	Georgia Public Service Commission (GPSC)	17687	Georgia Power Company's Application for Approval of Integrated Resource Plan	Staff of the GPSC
2004	GPSC	17688	Savannah Electric and Power Company's Application for Approval of Integrated Resource Plan	Staff of the GPSC
2004	OCC	PUD 200300633	Establishment of Purchased Power Rates and Purchase Power Contract with AEP - Oklahoma	Blue Canyon Windpower II, LLC
2004	OCC	PUD 200300634	Establishment of Purchased Power Rates and Purchase Power Contract with AEP - Oklahoma	Blue Canyon Windpower V, LLC
2004	PUCT	28813	Inquiry into Reasonableness of the Rates and Services of CapRock Energy Corporation	St. Lawrence Cotton Growers Assoc. and Texas Cotton Ginners Assoc.
2005	OCC	PUD 200500059	Establishment of Purchased Power Rates and a Purchase Power Contract with Oklahoma Gas and Electric	Chermac Energy Corporation and Sleeping Bear LLC
2005	OCC	PUD 200500177	Establishment of Purchased Power Rates and a Purchase Power Contract with Oklahoma Gas and Electric	Chermac Energy Corporation and Sleeping Bear LLC
2007	New Mexico Public Regulation Commission (NMPRC)	06-00258-UT	El Paso Electric Company's (EPE) General Rate Case and Advice Notice	EPE
2007	PUCT	34695	Petition of EPE to Reconcile Fuel Costs and Revenues and Request to Recover Mine Closing Cost	EPE
2007	NMPRC	07-00317-UT	Investigation Into Rates and Charges of EPE	EPE
2007	NMPRC	07-00411-UT	EPE Application for Approval of Energy Efficiency Programs	EPE



List of Prior Testimony  
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Year	Regulatory Commission	Docket/Case Number	Description of Proceeding	Party on Behalf Testimony was Submitted
2008	PUCT	35204	Petition of EPE for Fuel Surcharge	EPE
2008	NMPRC	08-00219-UT	EPE's 2008 Procurement Plan Pursuant to Renewable Energy Act	EPE
2008	PUCT	35856	Petition of EPE for Authority to Increase Fuel Factor, for Fuel Surcharge, and for Related Good-Cause Exception	EPE
2009	NMPRC	08-00024-UT	Rulemaking to Revise 17.7.2 NMAC	EPE
2009	NMPRC	09-00171-UT	EPE's General Rate Case Pursuant to Commission Order	EPE
2009	PUCT	37086	Petition of EPE to Decrease Fuel Factor	EPE
2009	NMPRC	09-00259-UT	EPE's 2009 Procurement Plan Pursuant to Renewable Energy Act	EPE
2009	PUCT	37690	Application of EPE to Change Rates, to Reconcile Fuel Costs, to Establish Formula-Based Fuel Factors, and to Establish an Energy Efficiency Cost Recovery Factor	EPE
2010	PUCT	38226	Application for Approval to Revise Its Energy Efficiency Cost Recovery Factor	EPE
2010	PUCT	38361	Application of EPE to Reconcile Fuel Costs (Severed from PUC Docket No. 37690)	EPE
2010	NMPRC	10-00200-UT	EPE's 2010 Procurement Plan Pursuant to Renewable Energy Act	EPE
2010	NMPRC	10-00266-UT	Application of EPE for Approval to Recover Regulatory Disincentives and Incentives Associated with Energy Efficiency and Load Management Programs	EPE
2011	NMPRC	11-00047-UT	EPE's Application for Approval of New and Modified Energy Efficiency Programs for 2011	EPE
2011	NMPRC	11-00263-UT	EPE's 2011 Procurement Plan Pursuant to Renewable Energy Act	EPE
2011	NMPRC	11-00276-UT	Investigation into EPE's Rates to Its Church Customers	EPE
2011	PUCT	39647	Application of EPE for a Discounted Rate Tariff for Churches Using Rate Schedule 24	EPE
2011	Federal Energy Regulatory Commission (FERC)	ER11-1915 et al	Public Service Company of New Mexico's Notice of Transmission Tariff Changes	EPE
2012	PUCT	40094	Application of EPE to Change Rates and Reconcile Fuel Costs	EPE
2012	PUCT	40301	EPE's Application to Amend Its Certificate of Convenience and Necessity for Two Generating Units at Montana Site in Texas	EPE
2012	NMPRC	12-00137-UT	EPE's Application for A Certificate of Public Convenience and Necessity to Construct, Own and Operate Two Generating Units at Montana Site in Texas	EPE
2012	NMPRC	11-00218-UT	Establishment of a Reasonable Cost Threshold for Renewable Resource Procurement pursuant to the Renewable Energy Act	EPE
2013	NMPRC	13-00176-UT	EPE's Application for Approval of New and Modified Energy Efficiency Programs for 2014, 2015 and 2016	EPE
2013	NMPRC	13-00297-UT	EPE's Application for a Certificate of Public Convenience and Necessity to Construct, Own and Operate Two Generating Units at Montana Power Station	EPE
2013	NMPRC	13-00380-UT	EPE's Application for Continued Use of Fuel and Purchased Power Cost Adjustment Clause	EPE
2013	PUCT	41763	EPE's Application for a Certificate of Convenience and Necessity for Two Additional Generating Units at Montana Power Station in El Paso County	EPE
2013	PUCT	41852	Application of EPE to Reconcile Fuel Costs	EPE
2014	PUCT	42042	Application of SPS for Approval of a Transmission Cost Recovery Factor	SPS

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Year	Regulatory Commission	Docket/Case Number	Description of Proceeding	Party on Behalf Testimony was Submitted
2014	PUCT	42004	Application of SPS for Authority to Change Rates and to Reconcile Fuel and Purchased Power Costs for the Period July 1, 2012 through June 30, 2013	SPS
2014	PUCT	43695	Application of SPS for Authority to Change Rates	SPS
2015	PUCT	44289	Application of SPS for Authority for Authority to Implement Surcharge Associated with Docket No. 42004	SPS
2015	PUCT	44609	Application of SPS for Authorization to Refund Amounts Received from Tri-County Electric Cooperative, Inc. Associated with Docket No. 42004	SPS
2015	PUCT	44671	Joint Application of SPS and Oncor Electric Delivery Company LLC for Approval of Accounting Entries Associated with the Purchase and Sale of Facilities, and for True-up of the Gain-on-Sale Calculation Associated with Docket No. 41430	SPS
2015	NMPRC	15-00139-UT	In the Matter of SPS's Application for Revision of Its Retail Rates Under Advice Notice No. 255	SPS
2015	PUCT	45141	Application of Southwestern Public Service Company for Authority to Implement a Net Refund for Overcollected Fuel Costs	SPS
2015	NMPRC	15-00296-UT	In the Matter of SPS's Application for Revision of Its Retail Rates Under Advice Notice No. 258	SPS
2015	NMPRC	15-00343-UT	Southwestern Public Service Company's Application for Authorization to Form a Subsidiary and to Contribute Certain Transmission Assets to the Subsidiary	SPS
2015	PUCT	45291	Application of Southwestern Public Service Company For Approval of Transaction with Xcel Energy Southwest Transmission Company, LLC and Related Approvals	SPS
2016	PUCT	45524	Application of Southwestern Public Service Company for Authority to Change Rates	SPS
2016	PUCT	46025	Application of Southwestern Public Service Company for Authority to Reconcile Fuel and Purchased Power Costs	SPS
2016	PUCT	46075	Application of Southwestern Public Service Company for Authority to Implement a Net Base Rate Refund	SPS
2016	NMPRC	16-0026-UT	Application for Approval of Modification of Cost Recovery Methodology under Fuel and Purchased Power Cost Adjustment Clause	SPS
2016	NMPRC	16-00269-UT	Application for Revision of Retail Rates	SPS
2016	PUCT	46496	Application of Southwestern Public Service Company for an Accounting Order Related to Back-Billed Charges by the Southwest Power Pool	SPS
2016	NMPRC	16-00291-UT	Application of Southwestern Public Service Company for an Accounting Order Related to Back-Billed Charges by the Southwest Power Pool	SPS
2017	NMPRC	17-00044-UT	Southwestern Public Service Company's Application for Approval of CCN and Operation of Wind Generation Facilities	SPS
2017	PUCT	46936	Southwestern Public Service Company's Application for Approval of CCN and Operation of Wind Generation Facilities	SPS
2017	PUCT	47369	Application of Southwestern Public Service Company for Authority to Implement a Fuel Surcharge	SPS
2017	PUCT	47527	Application of Southwestern Public Service Company for Authority to Change Rates	SPS
2017	NMPRC	17-00255-UT	Application for Revision of Retail Rates	SPS
2018	PUCT	48718	Application of Southwestern Public Service Company for Authority to Implement a Net Refund for Overcollected Fuel Costs	SPS

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2019	NMPRC	19-00170-UT	Application for Revision of Retail Rates	SPS
2019	PUCT	49831	Application of Southwestern Public Service Company for Authority to Change Rates	SPS
2019	NMPRC	19-00315-UT	Southwestern Public Service Company's Application for Approval of Continued Use of Its Fuel and Purchased Power Cost Adjustment Clause (FPPCAC)	SPS
2021	NMPRC	20-00222-UT	Joint Application of Avangrid, Inc , Avangrid Networks, Inc , NM Green Holdings, Inc , Public Service Company of New Mexico and PNM Resources, Inc for Approval of the Merger of NM Green Holdings, Inc. with PNM Resources, Inc.	NMPRC Utility Division Staff



## Historical Market Price of Cotton ([www.nasdaq.com](http://www.nasdaq.com))

