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Item Number: 486

Addendum StartPage: 0

SOAH DOCKET NO. 473-21-0538
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APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES	§ § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS

REDACTED PUBLIC VERSION

Supplemental Testimony and Exhibit

Of

JEFFRY POLLOCK

On Behalf of

Texas Industrial Energy Consumers

May 17, 2021

J. POLLOCK
INCORPORATED

4860

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

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

Table of Contents

GLOSSARY OF ACRONYMS

Term	Definition
BTMG	Behind-the-Meter Generation
Eastman	Eastman Chemical Company
FERC	Federal Energy Regulatory Commission
kW / kWh	Kilowatt / Kilowatt-Hour
MW	Megawatt
OATT	Open Access Transmission Tariff
RR	Revision Request
SPP	Southwest Power Pool
SWEPCO	Southwestern Electric Power Company
TIEC	Texas Industrial Energy Consumers
QF	Qualifying Facility

SOAH DOCKET NO. 473-21-0538
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APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES	§ § § §	**BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS**

AFFIDAVIT OF JEFFRY POLLOCK

State of Missouri)
) SS
County of St. Louis)

Jeffry Pollock, being first duly sworn, on his oath states:

1. My name is Jeffry Pollock. I am President of J. Pollock, Incorporated, 12647 Olive Blvd., Suite 585, St. Louis, Missouri 63141. We have been retained by Texas Industrial Energy Consumers to testify in this proceeding on its behalf;

2. Attached hereto and made a part hereof for all purposes is my Supplemental Testimony and Exhibit which have been prepared in written form for introduction into evidence in SOAH Docket No. 473-21-0538 and Public Utility Commission of Texas Docket No. 51415; and,

3. I hereby swear and affirm that my answers contained in the testimony are true and correct.

Jeffry Pollock

Subscribed and sworn to before me this 17th day of May 2021.

KITTY TURNER
Notary Public - Notary Seal
State of Missouri
Commissioned for Lincoln County
My Commission Expires: April 25, 2023
Commission Number: 15390610

Kitty Turner, Notary Public
Commission #: 15390610

My Commission expires on April 25, 2023.

SUPPLEMENTAL TESTIMONY OF JEFFRY POLLOCK

Introduction

Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A Jeffry Pollock; 12647 Olive Blvd., Suite 585, St. Louis, MO 63141.

Q ARE YOU THE SAME JEFFRY POLLOCK WHO PREVIOUSLY SUBMITTED DIRECT TESTIMONY ON BEHALF OF TEXAS INDUSTRIAL ENERGY CONSUMERS (TIEC)?

A Yes.

Q WHAT IS THE REASON FOR YOUR SUPPLEMENTAL DIRECT TESTIMONY?

A Pursuant to SOAH Order No. 9, I am presenting supplemental testimony to address the issues raised for the first time in SWEPCO's rebuttal testimony concerning SWEPCO's proposal to increase Texas base rates by $5.7 million based on a change in SWEPCO's treatment of retail load served by a customer's own behind-the-meter generation (BTMG).

Q ON PAGE 6 OF MR. ROSS'S REBUTTAL TESTIMONY, HE CHARACTERIZES THE $5.7 MILLION IMPACT ON SWEPCO'S TEST-YEAR TRANSMISSION CHARGES FROM SPP AS THE DIRECT RESULT OF SWEPCO'S INCLUSION OF LOAD FROM RETAIL BEHIND-THE-METER GENERATION IN SWEPCO'S MONTHLY COINCIDENT PEAK LOAD DATA USED BY SPP TO DETERMINE SWEPCO'S LOAD RATIO SHARE CONTRIBUTION TO [SPP] TRANSMISSION COSTS. IS THIS AN ACCURATE STATEMENT?

A No. The $5.7 million is not calculated based on the additional costs SWEPCO incurs from SPP due to SWEPCO's decision to include in its report of Network Load certain

load that a retail customer serves with its own BTMG.[1] Rather, the $5.7 million is the result of reallocating SWEPCO's *total* transmission revenue requirement (not just SPP charges) between its Arkansas, Louisiana, and Texas retail jurisdictions by assigning Eastman's retail BTMG load to Texas.

SWEPCO's approach misrepresents the impact on SWEPCO's SPP charges of including the load Eastman self serves with its own BTMG in Network Load. SWEPCO's analysis assumes that its *total* transmission revenue requirement is affected by changes in SPP-derived Load Ratio Shares, not just the SPP charges. Besides SPP transmission charges, SWEPCO's transmission revenue requirement also includes return on transmission invested capital, investment-related expenses (*i.e.,* depreciation, income taxes, other associated taxes, revenue credits) and operation and maintenance expense. However, none of these costs, which comprise approximately 34% of SWEPCO's test-year transmission revenue requirement, are affected by changes in SPP-determined Load Ratio Shares.[2]

In addition, the $5.7 million assumed zero retail BTMG in SWEPCO's Arkansas and Louisiana retail jurisdictions. Under SWEPCO's methodology, the inclusion of such load would reduce the portion allocated to Texas.

Not only is the $5.7 not a valid proxy for the impact of retail BTMG, it is also not an accurate representation of the impact of retail BTMG on SWEPCO's transmission costs.

[1] SWEPCO Response to TIEC 11-1 (HSPM): The actual amount is $[redacted] million.

[2] Rebuttal Testimony of John O. Aaron, JOA WP - SWEPCO TX COS_Class TY 3_2020 Rebuttal: Texas retail transmission revenue requirement ($96.1 million) less SPP charges ($63.3 million) equals $32.8 million, which is 34% of $96.1 million.

Q MR ROSS STATES (ON PAGE 12) THAT, IN UPDATING ITS REPORTING TO INCLUDE RETAIL BTMG LOADS IN RESPONSE TO SPP'S DIRECTIVE, SWEPCO HAS NOT INCLUDED CERTAIN LOADS BECAUSE THE GENERATION AND ASSOCIATED LOAD ARE NOT SYNCHRONIZED TO THE SPP SYSTEM. HOW DO YOU RESPOND?

A First, this statement reveals that SWEPCO is treating Eastman differently from other retail BTMG loads.

Second, load is always synchronized to the SPP system. If that were not the case, SWEPCO could not serve that load.

For example, let's assume a customer has an asynchronous solar array behind the customer's retail meter. On a hot sunny day, the array would generate its maximum power output during the early to mid-afternoon, but the output would decline during the late afternoon reaching zero output by evening. SWEPCO would immediately experience increasing power demand from this customer as the output of the customer's solar array declines. This circumstance is no different than Eastman's retail BTMG, except that Eastman could potentially reduce load during a generator outage.

For load not to be synchronized, it would have to be physically separated from the grid through a relay or disconnect switch. However, if the relay or disconnect switch was designed to close the circuit after detecting a change in power flows (due to a generator outage), power would be imported from the grid, and SWEPCO would immediately experience higher demand.

Further, the fact that SWEPCO does not yet have complete information on retail BTMG load in all of its retail jurisdictions that it claims must be reported as Network Load is sufficient cause to reject the proposed $5.7 million increase in Texas rates and the proposed Synchronous Self-Generation Load Charge that would apply only to Eastman.

To the extent that Mr. Ross had intended to assert that the some *generation,* rather than load, was not synchronized, that may be true but it has no bearing on the effect on SWEPCO's and SPP's load when the generation goes down. If rooftop solar or other asynchronous BTMG goes down by a given amount, SWEPCO will then have to provide electricity to replace what was being provided by the asynchronous BTMG, just as it does for load served by synchronous BTMG. SPP's cite to synchronous vs. non-synchronous load is a distinction without a difference. There is also nothing in the SPP OATT that distinguishes retail load served by synchronous generation from retail load served by asynchronous generation. If the load Eastman serves is required to be included in Network Load (which it is not), then so would be the retail load served by every other customer's BTMG, including rooftop solar. The ultimate rate increase to Texas ratepayers from such a change is unknown.

Q WHAT HAS SWEPCO STATED ABOUT ITS FAILURE TO INCLUDE IN NETWORK LOAD THESE OTHER RETAIL LOADS SERVED BY BTMG?

A Mr. Ross states that SWEPCO is continuing to review these situations and will update its reporting "as appropriate."[3]

[3] Rebuttal Testimony of C. Richard Ross at 12.

Q HAS SWEPCO PROVIDED A LIST OF RETAIL BTMGS?

A Yes. **Exhibit JP-S1** is a list of the retail BTMGs in SWEPCO's Texas service territory. In Texas alone, SWEPCO has identified 187 retail customers that self-supply a portion of their power. These generators range in size from 1.5 kW to 440,000 kW. Of the 187 retail customers with load served by BTMG, SWEPCO proposes to include only one in the calculation of its Network Load. Yet under the interpretation of Network Load that SWEPCO puts forward, all retail load served by a customer's own BTMG would be included.

Q MR. LOCKE ASSERTS THAT SPP CONSIDERED AND DID NOT ADOPT AN "EXCEPTION" TO EXCLUDE RETAIL LOAD SERVED BY SMALL RETAIL BTMG. IS THAT TRUE?

A No it is not. Revision Request (RR) 241 was not a proposal to "exclude" any load served by retail BTMG from the definition of Network Load in the tariff at issue. Rather, the purpose of RR 241 was to *add* (for the first time) load served by large (over 1 MW) retail BTMG, such as Eastman's, to the definition of Network Load. Had the current definition of Network Load included Eastman's BTMG load, RR 241 would not have been necessary. In other words, by rejecting RR 241, the status quo was retained; namely that Network Load does not include retail BTMG load. RR 241 did not address load served by small BTMG at all. Since no load served by BTMG was included in the definition of Network Load, there was no need to create a specific exemption for load served by small BTMG.

Q WHAT DID SPP DO AFTER THE REJECTION OF RR 241?

A According to SWEPCO witness Mr. Ross, after the rejection of the proposal to amend

SPP's OATT to include load served by large retail BTMG, SPP nonetheless decided to direct SWEPCO to calculate its monthly Network Load as if that amendment had been adopted.[4]

Q ON PAGE 10 OF MR. ROSS'S REBUTTAL TESTIMONY HE STATES THAT SWEPCO "DOES NOT HAVE A POSITION ON THIS ISSUE" BUT IS FOLLOWING AN "SPP DIRECTIVE." DO YOU AGREE?

A Not entirely. First, SWEPCO has, until recently, taken the position that Eastman's load should not be included in Network Load. It was not included as Network Load in SWEPCO's last rate case, which was contested, and the Commission's decision in that case did not provide for the inclusion of Eastman's load in Network Load in establishing SWEPCO's revenue requirement or in designing rates. The definition of Network Load has not changed since that case.

Second, as Mr. Locke of SPP testifies, it is up to the Network Customer to submit accurate information concerning their Network Load, and SPP is not authorized to verify the submission or impose a penalty for failure to properly provide it.[5] Further, it is SWEPCO that changed its treatment of Eastman load in its submissions beginning in October 2018. To the extent someone on the SPP Staff advised SWEPCO that SPP had unilaterally decided to implement the tariff change that was rejected in the RR-241 deliberations, SWEPCO was free to continue to report Network Load consistent with its longstanding application of the tariff, and consistent with the positions of numerous other SPP Network Customers.

[4] Rebuttal Testimony of C. Richard Ross at 11.

[5] Rebuttal Testimony of Charles J. Locke at 4-5.

Q MR. LOCKE CITES SEVERAL FERC CASES IN SUPPORT OF HIS ARGUMENT THAT FERC POLICY UNDER ORDER NOS. 888 AND 890 REQUIRES RETAIL LOAD SERVED BY A CUSTOMER'S OWN BTMG TO BE INCLUDED. DO YOU AGREE?

A No. Although neither Mr. Locke nor I are attorneys, it is apparent that those cases refer to the treatment of load served by *wholesale* BTMG, not retail BTMG. The use of the term "customers" in those cases is clearly a reference to the electric utilities, electric cooperatives, and municipal utilities that are, in fact, the Network Customers of SPP and similar organized power pools. It was not a reference to the individual retail customers of those Network Customers. In fact, the comments of the participants in those dockets, who were contesting whether or not wholesale BTMG should be included, made it clear that the loads served by retail BTMG such as Eastman's would not be included in Network Load.[6]

Q HAS FERC CONSIDERED WHETHER THE LANGUAGE IN THE SPP OATT REQUIRES THE INCLUSION OF LOAD SERVED BY RETAIL BTMG AS SPP CLAIMS?

A Yes, as noted on page 20 of my direct testimony, FERC affirmed MISO's interpretation of its OATT—which defines Network Load in the same way as SPP's tariff--that retail load served by the BTMG of cogenerators like Eastman should not be included in Network Load.

Q DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT TESTIMONY?

A Yes.

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[6] *Promoting Wholesale Competition Through Open Access Non-Discriminatory Transmission Services by Public Utilities; Recovery of Stranded Costs by Public Utilities and Transmitting Utilities*; Docket Nos. RM95-8-000 and RM94-7-001, Initial Comments of Cajun Electric Power Cooperative, Inc. at 1, 17-19 (Aug. 3, 1995) (noting that QF load behind the meter would not be included in the load ratios shown under the OATT);

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

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO TEXAS INDUSTRIAL ENERGY CONSUMERS' ELEVENTH SET OF REQUESTS FOR INFORMATION

Question No. TIEC 11-4:

Please identify all Texas retail customers by customer class that utilize behind-themeter generation to serve all or a portion of the customers' loads.

Response No. TIEC 11-4:

Please see TIEC 11-4 Attachment 1.

Prepared By: Christopher N. Martel — Title: Regulatory Consultant Sr

Sponsored By: Drew W. Seidel — Title: VP Dist Region Opers

Sponsored By: Paul E. Pratt — Title: Dir Customer Svcs & Mktg

SOAH Docket No. 473-21-0538
PUC Docket No. 51415
TIEC's 11th, Q. # TIEC 11-4
Attachment 1
Page 1 of 4

Class	Service Voltage Level	Service Type	Total Generation Capacity kW (AC)	Generator A Technology	Generator A Fuel	Generator A Type
IPP	T	Purchase Power	440,000.0	Internal combustion	Natural gas	Synchronous
Ind	T	Cogen	83,700.0	Steam turbine	Wood waste	Synchronous
Ind	D	Purchase Power	5,000 0	Steam turbine	Wood waste	Synchronous
Ind	D		372.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	72.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	60.0	Internal combustion	Waste gas	Inverter
Com	D	Cogen - Option 2	42.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	38.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	36.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	34.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	22 8	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	22.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	21.6	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	20.0	Photovoltaic	Solar	Inverter
Res	D		19 2	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	19 0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	19 0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	18.5	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	18 0	Photovoltaic	Solar	Induction
Res	D	Cogen - Option 2	18 0	Photovoltaic	Solar	Inverter
Res	D		16 6	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	15.4	Photovoltaic	Solar	Inverter
Res	D		15.0	Photovoltaic	Solar	Inverter
Res	D		14.4	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	14.1	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	14.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	14.0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	13.4		Solar	Inverter
Res	D		13.3	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	13.0	Photovoltaic	Solar	Inverter
Res	D		12.8	Photovoltaic	Solar	Inverter
Res	D	Net Metering	12.7	Photovoltaic	Solar	Inverter
Res	D	Net Metering	12 7	Photovoltaic	Solar	Inverter
Res	D		12 5	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	12.2	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	12.0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	12.0	Photovoltaic	Solar	
Com	D	Cogen - Option 2	12.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	12.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	12.0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	12.0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	12.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	12.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	12.0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	11 4	Photovoltaic		Inverter
Res	D	Cogen - Option 2	11.4	Photovoltaic	Solar	Inverter
Res	D		11 4	Photovoltaic	Solar	Inverter
Res	D		11.4	Photovoltaic	Solar	Inverter
Res	D		11.4	Photovoltaic	Solar	Inverter
Res	D		11.0	Photovoltaic	Solar	Inverter

Class	Service Voltage Level	Service Type	Total Generation Capacity kW (AC)	Generator A Technology	Generator A Fuel	Generator A Type
Res	D	Net Metering	11.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	11.0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	11.0	Micro turbine	Solar	Inverter
Res	D	Net Metering	10.7	Photovoltaic	Solar	Inverter
Res	D	Net Metering	10.7	Photovoltaic	Solar	Inverter
Res	D	Net Metering	10 7	Photovoltaic	Solar	Inverter
Res	D		10.6	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	10.5	Photovoltaic	Solar	Inverter
Res	D		10.3	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	10.2	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	10.0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	10 0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	10 0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	10 0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	10 0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	10.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	10 0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	10.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	10.0	Wind turbine	Wind	Inverter
Res	D	Cogen - Option 2	10.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	10 0	Photovoltaic	Solar	Inverter
Res	D		10.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	9.6	Photovoltaic	Solar	Inverter
Res	D	Net Metering	9.5	Photovoltaic	Solar	Inverter
Res	D		9.5	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	9.4	Photovoltaic	Solar	Inverter
Res	D	Net Metering	9.2	Photovoltaic	Solar	Inverter
Res	D		8.8	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	8.7	Photovoltaic	Solar	Inverter
Res	D		8.7	Photovoltaic	Solar	Inverter
Res	D	Net Metering	8.6	Photovoltaic	Solar	Inverter
Res	D		8.4	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	8 2	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	8.2	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	8 2	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	8.1	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	8.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7 9	Photovoltaic	Solar	Inverter
Res	D		7 8	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7.7	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7.7	Photovoltaic	Solar	Inverter
Res	D	Net Metering	7 7	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7 7	Photovoltaic	Solar	Inverter
Res	D		7.7	Photovoltaic	Solar	Inverter
Res	D		7.7	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7.6	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7.6	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7.6	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7 6	Photovoltaic	Solar	Inverter
Res	D	Net Metering	7.6	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7.6	Photovoltaic	Solar	Inverter

Class	Service Voltage Level	Service Type	Total Generation Capacity kW (AC)	Generator A Technology	Generator A Fuel	Generator A Type
Res	D		7.6	Photovoltaic	Solar	Inverter
Res	D		7.6	Photovoltaic	Solar	Inverter
Res	D		7.6	Photovoltaic	Solar	Inverter
Res	D		7.6	Photovoltaic	Solar	Inverter
Res	D		7.5	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7 5	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7.3	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7.3	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7.1	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7.1	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	7.0	Photovoltaic	Solar	Inverter
Res	D		7.0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	6 8	Photovoltaic	Solar	Inverter
Res	D		6.7	Photovoltaic	Solar	Inverter
Res	D	Net Metering	6.5	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	6.5	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	6.5	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	6.4	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	6.3	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	6.2	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	6.2	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	6.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	6.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	6.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	6.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	6.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	6.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	6.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	6.0	Photovoltaic	Solar	Inverter
Res	D		6.0	Photovoltaic	Solar	Inverter
Res	D		6.0	Photovoltaic	Solar	Inverter
Res	D		5.8	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5.4	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5.4	Photovoltaic	Solar	Inverter
Res	D	Net Metering	5.4	Photovoltaic	Solar	Inverter
Res	D		5.2	Photovoltaic	Solar	Inverter
Res	D		5.2	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5.2	Photovoltaic	Solar	Inverter
Res	D		5.2	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5 0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5 0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5.0	Photovoltaic	Solar	Inverter

SOAH Docket No. 473-21-0538
PUC Docket No. 51415
TIEC's 11th, Q. # TIEC 11-4
Attachment 1
Page 4 of 4

Class	Service Voltage Level	Service Type	Total Generation Capacity kW (AC)	Generator A Technology	Generator A Fuel	Generator A Type
Res	D	Cogen - Option 2	5.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5.0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	5.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	5.0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	5.0	Photovoltaic	Solar	Inverter
Res	D		5.0	Photovoltaic	Solar	Inverter
Res	D		5.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	4.8	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	4.8	Photovoltaic	Solar	Inverter
Res	D		4.1	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	4.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	4.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	4.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	4.0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	4.0	Photovoltaic	Solar	
Res	D	Cogen - Option 2	4.0	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	4.0	Photovoltaic	Solar	Inverter
Res	D	Net Metering	4.0	Photovoltaic	Solar	Inverter
Res	D		3.8	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	3.6	Photovoltaic	Solar	Inverter
Res	D		3.6	Photovoltaic	Solar	Inverter
Res	D		3.5	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	3.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	3.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	3.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	3.0	Photovoltaic	Solar	Inverter
Res	D		2.9	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	2.4	Photovoltaic	Solar	Inverter
Res	D		2.3	Photovoltaic	Solar	Inverter
Res	D		2.3	Photovoltaic	Solar	Inverter
Com	D	Cogen - Option 2	2.0	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	1.5	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	1.5	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	1.5	Photovoltaic	Solar	Inverter
Res	D	Cogen - Option 2	1.1	Photovoltaic	Solar	Inverter