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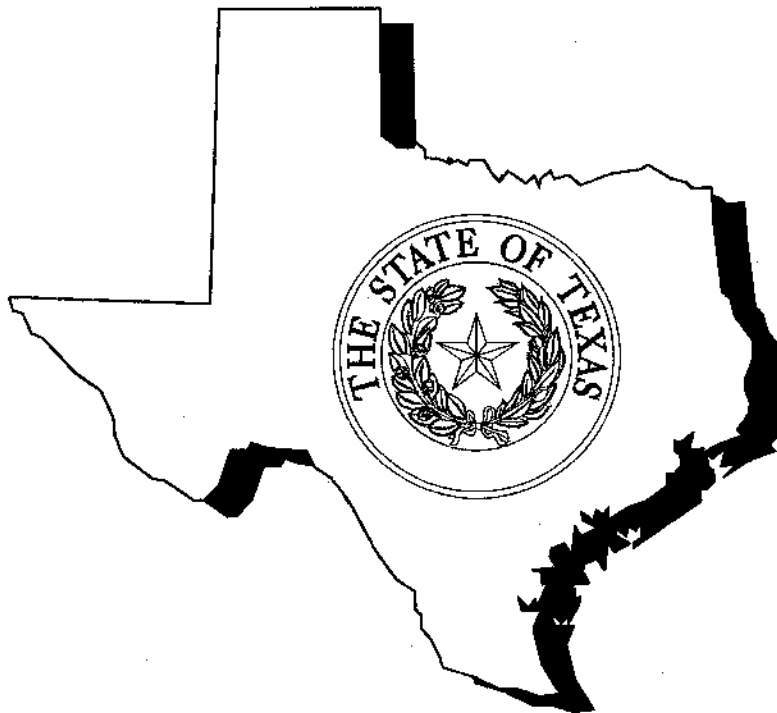
**Item Number - 47**

**SOAH DOCKET NO. 473-24-04312  
PUC DOCKET NO. 54614**

**STATEMENT OF INTENT AND  
APPLICATION OF EL PASO  
ELECTRIC COMPANY FOR  
APPROVAL OF TEXAS ELECTRIC  
VEHICLE-READY PILOT PROGRAMS  
AND TARIFFS**

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**BEFORE THE STATE OFFICE  
  
OF  
  
ADMINISTRATIVE HEARINGS**



**DIRECT TESTIMONY OF  
  
ADRIAN NARVAEZ  
  
RATE REGULATION DIVISION  
  
PUBLIC UTILITY COMMISSION OF TEXAS  
  
February 27, 2024**

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### **ATTACHMENTS:**

**Attachment AN-1**

**Regulatory Resumé of Adrian Narvaez**

**I. PROFESSIONAL QUALIFICATIONS**

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

A. Adrian Narvaez, Public Utility Commission of Texas (Commission), 1701 N. Congress Avenue, Austin, TX 78711-3326.

**Q. By whom are you employed and in what capacity?**

A. I am employed by the Commission as a Rate Analyst in the Tariff and Rate Analysis Section of the Rate Regulation Division.

**Q. What are your responsibilities as a Rate Analyst for the Commission?**

A. My principal responsibility is analyzing utility filings on matters relating to rate design and cost allocation. My responsibilities include analyzing electric industry regulatory policy, reviewing tariffs to determine compliance with Commission requirements, and preparing and presenting testimony as an expert witness on cost allocation and rate design issues in contested proceedings before the Commission and the State Office of Administrative Hearings (SOAH).

**Q. Please state your educational background and professional experience.**

A. Attachment AN-1 contains a summary of my regulatory experience and educational background.

**Q. Have you previously filed testimony before the Commission?**

A. Yes. Attachment AN-1 contains a listing of direct testimony I have filed recently at the Commission.

**II. PURPOSE AND SCOPE OF TESTIMONY**

**Q. What is the purpose of your testimony in this proceeding?**

A. My testimony regarding El Paso Electric Company's (EPE or the Company) application will address EPE's proposed Texas Electric Vehicle (EV)–Ready tariffs. My testimony addresses, in whole or in part, the following issues from the Commission's Preliminary Order issued on November 3, 2023:

**EV Smart Rewards Pilot Program**

3. Do the proposed rates for the EV Smart Rewards Pilot Program comply with the requirements of PURA § 36.003?

b. Is the rate not unreasonably preferential, prejudicial, or discriminatory?

c. Is the rate sufficient, equitable, and consistent in application to each class of consumer?

**Whole House EV Pilot Incentive Credit Rider**

7. What impacts will there be on Texas customers who have not subscribed to the pilot program if El Paso Electric's application is granted?

9. Do the proposed rates for the Whole House EV Pilot Incentive Credit Rider comply with the requirements of PURA § 36.003?

b. Is the rate not unreasonably preferential, prejudicial, or discriminatory?

c. Is the rate sufficient, equitable, and consistent in application to each class of consumer?

14. What impacts will there be on Texas customers who have not subscribed to the pilot program if El Paso Electric's application is granted?

**PowerConnect Pilot Program**

16. Is El Paso Electric proposing to subsidize the costs of make-ready infrastructure through rates or charges for services provided by the electric utility's regulated services as permitted under PURA § 42.0103(d)?

23. Do the proposed rates comply with the requirements of PURA § 36.003?

a. Is the rate just and reasonable?

b. Is the rate not unreasonably preferential, prejudicial, or discriminatory?

c. Is the rate sufficient, equitable, and consistent in application to each class of consumer?

**Take Charge TX Pilot Program**

31. Do the proposed rates comply with the requirements of PURA § 36.003?

a. Is the rate just and reasonable?

b. Is the rate not unreasonably preferential, prejudicial, or discriminatory?

c. Is the rate sufficient, equitable, and consistent in application to each class of consumer?

32. Do El Paso Electric's proposed programs and the corresponding tariffs comply with all other applicable requirements of PURA and Commission rules?

**Q. What is the basis for your review?**

A. PURA § 36.003, relating to Just and Reasonable Rates, states in part:

(a) The regulatory authority shall ensure that each rate an electric utility or two or more electric utilities jointly make, demand, or receive is just and reasonable.

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

(c) An electric utility may not:

(1) grant an unreasonable preference or advantage concerning rates to a person in a classification;

PURA § 36.006, relating to Burden of Proof, states in part:

In a proceeding involving a proposed rate change, the electric utility has the burden of proving that:

(1) the rate change is just and reasonable, if the utility proposes the change;

16 TAC §25.1, relating to Purpose and Scope of Rules, states:

Mission of the Public Utility Commission of Texas (commission). The mission of the commission is to assure the availability of safe, reliable, high quality services that meet the needs of all Texans at just and reasonable rates. To accomplish this mission, the commission shall regulate electric and telecommunications utilities as required while facilitating competition, operation of the free market, and customer choice.

Under 16 Texas Administrative Code (TAC) § 25.234(a), relating to Rate Design, rates "shall not be unreasonably preferential, prejudicial, or discriminatory, but shall be sufficient, equitable, and consistent in application to each class of customers, and shall be based on cost."

### **III. SUMMARY OF RECOMMENDATIONS**

#### **Q. What is your recommendation?**

A. I recommend that:

- EPE's proposed Whole House EV (WHEV) Pilot Incentive Credit Rider is unreasonably preferential and discriminatory, is inequitable and grants an unreasonable preference concerning rates to certain persons in a classification, and should be rejected as it is not just and reasonable;
- EPE's proposed EV Smart Rewards pilot program is unreasonably preferential and discriminatory, is inequitable, and should be rejected as it is not just and reasonable;
- EPE's proposed PowerConnect pilot program is unreasonably preferential and discriminatory, is inequitable, and should be rejected as it is not just and reasonable;

- EPE's Take Charge TX (TCTX) pilot program should be rejected as filed, because it is impossible to verify if the TCTX pilot program would result in rates that are unreasonably preferential and discriminatory; and
- Any adjustments to EPE's current EV rate structure be contingent on, and be made subsequent to, establishing a separate rate class for EV customers in a future proceeding.

#### **IV. EPE'S PROPOSED EV-READY PROGRAMS**

##### **Q. What are EPE's proposed EV-Ready Pilot Programs?**

A. EPE proposes 4 different pilot programs in its application. The WHEV Pilot Incentive Credit Rider provides unmetered EV service to residential customers. The program provides credits for energy usage from midnight to 8 AM.<sup>1</sup> The credits would apply to all usage during the specified time frame, not just EV-related usage.<sup>2</sup> EPE's proposed credits for this program are based on incremental capacity costs based on EPE's calculations in their last rate case.<sup>3</sup>

The EV Smart Rewards pilot program provides for utility-managed EV charging to residential customers.<sup>4</sup> This program includes a one-time enrollment incentive payment of \$125 and annual incentive payments of \$50 to customers that enroll, while participation is limited to 880 residential customers.<sup>5</sup>

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<sup>1</sup> Direct Testimony of George Novela at 4 (Jan. 31, 2023) (Novela Direct).

<sup>2</sup> Direct Testimony of Manuel Carrasco at 10 (Jan. 31, 2023) (Carrasco Direct).

<sup>3</sup> *Id.* at 9.

<sup>4</sup> Novela Direct at 3.

<sup>5</sup> Direct Testimony of Angelina Rodriguez at 14 (Rodriguez Direct).



1           The PowerConnect pilot program provides a rebate for a portion of EPE's costs for  
2           distribution system updates and improvements in order to provide EV charging.<sup>6</sup> The  
3           customer will procure its own charging equipment and electrical contractor, while EPE will  
4           provide utility-side installations at a rebate.<sup>7</sup> This program is open to non-residential  
5           customers.<sup>8</sup>

6           Finally, the TCTX pilot program provides non-residential customers the  
7           opportunity to choose the EV infrastructure to be purchased, owned, and operated in part,  
8           or in full, by the Company.<sup>9</sup> The tariff includes a monthly fixed fee for the recovery of the  
9           EV infrastructure and equipment costs recovered over the time period selected by the  
10          customers, and a variable fee for the recovery of O&M expenses in effect for the 10-year  
11          customer agreement term.<sup>10</sup>

12   **Q.   As an initial matter, is there any need to approve the tariffs or programs EPE is**  
13   **proposing?**

14   A.   No. It is important to recognize at the outset that none of EPE's proposals in this  
15   proceeding are necessary for EPE to provide adequate and reasonable electric utility  
16   service to its customers, whether they own EVs, EV charging stations, or neither. Nor are  
17   any of these proposals necessary for EPE to maintain its financial integrity. EPE's existing  
18   rates and tariffs are fully adequate to provide reasonable and adequate electric service to  
19   its customers.

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<sup>6</sup> *Id.* at 16.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> Carrasco Direct at 12.

<sup>10</sup> *Id.*

1 **Q. Would it be reasonable and appropriate to adopt EPE's proposed WHEV tariff?**

2 A. No. EPE has not shown why providing unmetered EV service is necessary in order to  
3 provide adequate electric service. Meters are necessary in order to assure proper cost  
4 recovery and to avoid unreasonable cross-subsidizations. The WHEV program amounts to  
5 preferential treatment for customers enrolled in this program as they will be the only  
6 residential customers avoiding the costs associated with EV meters. Furthermore, and more  
7 importantly, the program would also unreasonably subsidize non-EV energy consumption  
8 since customers enrolled in this program will receive credits for all energy usage in the  
9 early hours of the morning, including all non-EV-related usage. Therefore, non-EV related  
10 energy consumption will be subsidized for this subset of customers at the expense of other  
11 customers. This approach is blatantly and unreasonably discriminatory and preferential,  
12 as any benefits associated with off-peak energy usage should accrue to all customers with  
13 such usage patterns, and not just the EV-owning customers in this program. Additionally,  
14 such a discriminatory program is also completely unnecessary, as EPE has time-of-use  
15 options available to customers, which can provide incentives to customers to shift energy  
16 usage into off-peak times in a fair and non-discriminatory manner.<sup>11</sup>

17 EPE has also not shown why modifications to its rate design applicable to all  
18 customers, such as mandatory demand charges or adjustments to the time-of-use rate  
19 design, would not better serve the goal of encouraging a shift of electric consumption from  
20 on-peak periods to off-peak periods. There is no good reason to single-out certain EV

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<sup>11</sup> *Application of El Paso Electric Company to Change Rates*, Docket No. 52195, Clean Copy of Tariff at Schedule No. 01 Residential Service Rate (Sep. 28, 2022).

customers for special treatment in this regard, when a broader rate design approach would provide more benefits in a non-discriminatory manner.

**Q. Would it be reasonable and appropriate to adopt EPE's proposed EV Smart Rewards program and PowerConnect program?**

A. No. With regards to the EV Smart Rewards Program, EPE has also not shown why modifications to its rate design applicable to all customers would not better encourage a shift in electric consumption from on-peak periods to off-peak periods. Instead, EPE's EV Smart Rewards Program's incentive payments represents special treatment for those who choose to enroll in this program as they would receive what amounts to subsidies for electric consumption in order to encourage utility-managed EV charging.

The PowerConnect Program subsidizes non-residential EV customers through rebates that would reduce or offset the cost of improvements to EPE's distribution system needed in order to provide EV service to customers enrolled in this program. Such a program violates the requirement under 16 TAC § 25.234(a) that rates be based on cost since participating customers would not be required to pay for the costs that they are causing the Company to incur. EPE does not explain how adopting the PowerConnect Program helps to provide adequate electric service instead of merely promoting EV adoption through subsidies provided to program participants at the expense of other ratepayers. Furthermore, the PowerConnect program is particularly egregious as it will provide subsidies to participants in addition to subsidies that are already being provided by the state and federal governments. In her direct testimony, Angelina Rodriguez states:

The goal of this program is to be complementary to other available federal programs created through the Infrastructure Investment and Jobs Act, such

as the NEVI program for installation of charging stations by Texas DOT and the Clean School Bus program administered by EPA.<sup>12</sup>

Adding subsidies on top of existing subsidies can create highly distortionary incentives and cause unintended consequences. In this instance, such ‘pancaking’ of subsidies could lead to significant and unsustainable over-investment in EV-related infrastructure and costs. This over-investment is very likely to eventually harm the broader body of ratepayers, either through higher rates, or through reduced reliability as highly subsidized EV-infrastructure investment costs displace needed resiliency-related investment.

With regards to the EV Smart Rewards and the PowerConnect programs, EPE does not clarify how it plans to recover program costs and which customers will ultimately be responsible for paying these costs.<sup>13</sup> EPE refused to commit to recovering program costs entirely from customers participating in this program.<sup>14</sup> Effectively, EPE is asking for approval of several unnecessary riders and programs which might lead to significant costs being incurred, but is refusing to address the burden of those costs. Adopting the EV Smart Rewards and the PowerConnect programs would likely result in unjust and unreasonably preferential and discriminatory subsidies that may be recovered at the expense of other customers.

**Q. Would it be reasonable and appropriate to adopt EPE’s proposed TCTX pilot program?**

**A.** No, it should not be adopted as filed. EPE’s proposed TCTX program relies on non-standard pricing tailored to individual customers for both the monthly level charge, as

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<sup>12</sup> Rodriguez Direct at 16.

<sup>13</sup> Novela Direct at 17.

<sup>14</sup> EPE’s Response to the Office of Public Utility Counsel’s First Request for Information at Response to OPUC 1-7 (Dec. 20, 2023).

1 well as the fixed O&M charge. While customer-specific pricing may be appropriate in  
2 certain uncommon situations associated with proper utility service, it raises serious  
3 concerns regarding the ability of the Commission and intervenors to scrutinize the details  
4 of EV infrastructure costs and TCTX rider revenues. EPE's rates must be examined to  
5 ensure they are just, reasonable, non-discriminatory, non-preferential, and based on cost.  
6 Fully evaluating EPE's costs and revenues associated with Schedule TCTX would be  
7 incredibly difficult, due to the customer-specific nature of each and every EV infrastructure  
8 installation, and the potential for there to be numerous such installations. This difficulty  
9 would significantly interfere with the ability of the Commission and stakeholders to  
10 determine whether any undue cross-subsidization, or other form of discriminatory or  
11 preferential treatment, was occurring under the application of Schedule TCTX. Similarly,  
12 in the event of a formal dispute between a customer and EPE that arises under Schedule  
13 TCTX, the non-tariffed and customer-specific nature of the costs and charges has the  
14 potential to significantly burden the Commission and the court. The proper and reasonable  
15 way for an electric utility to provide utility-owned EV charging would be for it to establish  
16 a rate class based on a variety of standardized EV charging installations and rates, as is  
17 done for utility-owned lighting facilities across the state.

18 **Q. How should additional EV rate structures be addressed by EPE in future**  
19 **proceedings?**

20 A. As demonstrated in the discussion of EPE's proposed EV programs, one of the main issues  
21 that arises with rate proposals aimed at facilitating EV adoption or incentivizing certain  
22 consumption patterns is that such proposals usually entail various forms of preferential  
23 treatment that are not applicable to other customers within the same class, or subsidies that

1 are applied to EV customers at the expense of non-EV customers. This is because EV  
2 charging requires investment in equipment and infrastructure that is unique to EV  
3 customers. These costs are not shared by other customers within the same class and do not  
4 provide benefits to EPE's distribution system as a whole, rather such subsidization of  
5 potentially large loads might in the long run reduce the resilience and reliability of the EPE  
6 system. As is the case with Street and Outdoor lighting service, EV charging service  
7 requires investing in equipment and infrastructure that are unique to the provision of the  
8 specific service being provided. Therefore, any proposed discounts or incentives designed  
9 for EV customers will always be preferential as they will only ever be open to EV  
10 customers, despite the fact that other customers may have similar usage characteristics.  
11 Likewise, any proposal aimed at reducing the costs for EV customers below the cost of  
12 service, or changing energy consumption patterns through incentive payments only  
13 available to EV customers will always result in the discriminatory policy of subsidizing  
14 EV customers by shifting cost to other customers. Unless the Company commits to  
15 recovering the funds needed to pay for the credit or incentive payments provided to EV  
16 customers from EV customers themselves, these subsidies will always come from non-EV  
17 customers. Even such a commitment or directive to only recover the associated costs from  
18 participating customers would present significant complications. Intervenors, Staff,  
19 SOAH, and the Commission only have a limited time window in which to review, opine,  
20 and decide on issues presented in major electric rate proceedings. In recent years, many  
21 incremental cost recovery riders have been approved or expanded, including the

Distribution Cost Recovery Factor,<sup>15</sup> the Generation Cost Recovery Rider,<sup>16</sup> and the resiliency-related rider.<sup>17</sup> In addition to the existing Transmission Cost Recovery Factor and certain utility-specific nonstandard programs, such as EPE's community solar program,<sup>18</sup> these riders and programs require increasing amounts of time and effort to review and reconcile in the context of a rate case in order to ensure compliance with PURA and Commission rules. Approving yet more programs which will perpetually require additional review and reconciliation in every future rate proceeding, especially when they are unnecessary, itself runs the risk of unreasonably burdening the Commission and the court in their duties to serve the public interest.

**Q. Is there a better way to implement EV-specific rates and programs, if such a policy was desired?**

A. Yes. While there is no fundamental need for EV-specific rates or tariffs, if EV-specific policy is to be embedded in rates, it would be much more reasonable for EPE to establish a separate EV rate class, similar to the manner in which lighting rates are treated. Such an approach is consistent with well-established ratemaking practice, is more transparent for all stakeholders, and would more reasonably facilitate compliance with PURA and Commission rules. Establishing a separate rate class for EV customers would allow EPE the possibility of providing rate structures tailored to various EV customers while conforming with PURA and Commission Rules' requirement that rates be based on cost. The cost of EV infrastructure and equipment, as well all other costs that EV customers

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<sup>15</sup> 16 TAC § 25.243.

<sup>16</sup> 16 TAC § 25.248.

<sup>17</sup> 16 TAC § 25.62(f).

<sup>18</sup> *Id.* at 16 TAC § 25.239.

1 cause the Company to incur, would be exclusively assigned or allocated to, and recovered  
2 from, EV customers. This is the same treatment applied to Street and Outdoor lighting  
3 customers by all regulated utilities in Texas.<sup>19</sup> As discussed above, Street and Outdoor  
4 lighting service requires investment in equipment and infrastructure that is unique to the  
5 provision of lighting service, similar to EV charging service. This is one of the main reasons  
6 for why Lighting Service is treated as a separate class even within ERCOT, where  
7 customers are usually classified based on the voltage at which they connect to the utility's  
8 system. Furthermore, lighting classes include various rates and rate structures for the  
9 numerous different types of standard equipment options that lighting customers can  
10 employ.<sup>20</sup> An EV rate class can also provide various rate structures based on different EV  
11 equipment such that rate options can be available for all residential and non-residential EV  
12 customers in a non-discriminatory manner. Additionally, EV rate structures can be  
13 specifically tailored to promote a more efficient use of EPE's distribution system by EV  
14 customers.

## 16 **VII. CONCLUSION**

### 17 **Q. Please summarize your recommendation.**

18 A. EPE's application should be rejected. If the Commission desires to establish or facilitate  
19 EV-specific treatments in EPE's rates and tariffs, EPE should be allowed to request the  
20 establishment of an EV-charging rate class in a future proceeding.

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<sup>19</sup> See *Compliance Filing for Final Order in Docket No. 53601 (Application of Oncor Delivery Company LLC for Authority to Change Rates)* Docket No. 54817, *Compliance Tariff for Final Order in Docket No. 53601 at Rate Schedule 6.1.1.1.8 Lighting Service* (Apr. 21, 2023).

<sup>20</sup> *Application of El Paso Electric Company to Change Rates*, Docket No. 52195, *Clean Copy of Tariff at Schedule No. 08 Government Street Lighting Service Rate and Schedule No. 28 Area Lighting Service Rate* (Sep. 28, 2022).



1   **Q.     If you do not address an issue or position in your testimony, should that be interpreted**  
2       **as Staff supporting EPE’s position on that issue?**

3   A.     No. The fact that I do not address an issue in my testimony should not be construed as  
4       agreeing, endorsing, or consenting to any position taken by EPE.

5   **Q.     Does this conclude your direct testimony?**

6   A.     Yes.

## **Adrian Narvaez Canto**

Public Utility Commission of Texas  
1701 North Congress Avenue  
Austin, TX 78711-3326

### **REGULATORY EXPERIENCE**

Rate Analyst, Tariff and Rate Analysis Section

Public Utility Commission of Texas Rate Regulation Division

Employed: June 2015 to present.

Duties: Perform analysis of tariff filings, cost allocation, and rate design. Review tariffs of regulated utilities to determine compliance with Commission requirements. Analyze cost allocation studies and rate design issues for regulated electric and water utilities. Analyze policy issues associated with the regulation of the utility industry. Work on or lead teams in contested cases, reports, the development of market rules, and research concerning pricing and related issues. Prepare and present testimony as an expert witness on rate and related issues in docketed proceedings before the Commission and the State Office of Administrative Hearings.

### **EDUCATION:**

2014            The University of Texas at Austin, Austin, TX  
Bachelor of Arts in Economics and French

### **List of Testimony Filed at the Public Utility Commission of Texas:**

**Docket No. 45712** - *Application of Southwestern Electric Power Company for Approval of a Distribution Cost Recovery Factor*, May 4, 2016.

**Docket No. 45787** - *Application of AEP Texas Central Company for Approval of a Distribution Cost Recovery Factor*, May 23, 2016.

**Docket No. 45788** - *Application of AEP Texas North Company for Approval of a Distribution Cost Recovery Factor*, May 23, 2016.

**Docket No. 46357** - *Application of Entergy Texas for Approval to Amend its Transmission Cost Recovery Factor*, December 6, 2016.

**Docket No. 46449** - *Application of Southwestern Electric Power Company for Authority to Change Rates*, May 2, 2017.

**Docket No. 47235** - *Oncor Electric Delivery Company LLC's Application for 2018 Energy Efficiency Cost Recovery Factor*, July 20, 2017

**Docket No. 47527** - *Application of Southwestern Public Service Company for Authority to Change Rates*, Revenue Requirement Direct Testimony, May 2, 2018.

**Docket No. 47527** - *Application of Southwestern Public Service Company for Authority to Change Rates*, Cost Allocation and Rate Design Direct Testimony, May 2, 2018.

**Docket No. 47527** - *Application of Southwestern Public Service Company for Authority to Change Rates*, Cost Allocation and Rate Design Cross-Rebuttal testimony, May 22, 2018.

**Docket No. 48231** - *Application of Oncor Electric Delivery Company for a Distribution Cost Recovery Factor*, May 24, 2018.

**Docket No. 48401**- *Application of Texas-New Mexico Power Company for Authority to Change Rates*, Direct Testimony, August 20, 2018.

**Docket No. 48401**- *Application of Texas-New Mexico Power Company for Authority to Change Rates*, Cross-Rebuttal testimony, August 28, 2018.

**Docket No. 48325** - *Application of Oncor Electric Delivery Company LLC for Authority to Decrease Rates Based on the Tax Cuts and Jobs Act of 2017*, September 11, 2018.

**Docket No. 48325** - *Review of Rate Case Expenses Incurred by Southwestern Electric Power Company and Municipalities in Docket No. 46449*, December 14, 2018.

**Docket No. 49057** - *Application of Entergy Texas for Approval of Transmission Cost Recovery Factor*, March 25, 2019.

**Docket No. 49427** - *Application of Oncor Electric Delivery Company to Amend its Distribution Cost Recovery Factor*, May 30, 2019.

**Docket No. 49494** - *Application of AEP Texas Inc. for Authority to Change Rates*, Direct Testimony, August 1, 2019.

**Docket No. 49494** - *Application of AEP Texas Inc. for Authority to Change Rates*, Cross-Rebuttal Testimony, August 13, 2019.

**Docket No. 50200** - *Application of Undine Texas, LLC and Undine Environmental, LLC for Authority to Change Rates*, June 10, 2020.

**Docket No. 49923** - *Application of Corix Utilities (Texas) Inc. to Implement Federal Tax Reduction Credit Riders*, July 31, 2020.

**Docket No. 50944** - *Application of Monarch Utilities I, L.P. for Authority to Change Rates*, October 27, 2020.

**Docket No. 51100** - *Application of the City of Lubbock, by and Through Lubbock Power & Light, for Authority to Establish Initial Wholesale Transmission Rates and Tariffs*, November 12, 2020.

**Docket No. 51611** - *Application of Sharyland Utilities, L.L.C. for Authority to Change Rates, Direct Testimony*, March 12, 2021.

**Docket No. 51611** - *Application of Sharyland Utilities, L.L.C. for Authority to Change Rates, Supplemental Testimony*, March 24, 2021.

**Docket No. 51415** - *Application of Southwestern Electric Power Company for Authority to Change Rates, Direct Testimony*, April 7, 2021.

**Docket No. 51415** - *Application of Southwestern Electric Power Company for Authority to Change Rates, Cross-Rebuttal Testimony*, April 23, 2021.

**Docket No. 52195** - *Application of El Paso Electric Company for Authority to Change Rates, Direct Testimony*, October 29, 2021.

**Docket No. 53601** - *Application of Oncor Electric Delivery Company for Authority to Change Rates, Direct Testimony*, September 2, 2022.

**Docket No. 53601** - *Application of Oncor Electric Delivery Company for Authority to Change Rates, Cross-Rebuttal Testimony*, September 16, 2022.

**Docket No. 54403** - *Application of El Paso Electric Company for a 10MW Community Solar Expansion and Authority to Modify Schedule No. CS Community Solar Rate, Testimony in Support of the Stipulation*, July 19, 2023.

**Docket No. 54634** - *Application of Southwestern Public Service Company for Authority to Change Rates, Direct Testimony*, August 11, 2023

**Docket No. 54634** - *Application of Southwestern Public Service Company for Authority to Change Rates, Cross-Rebuttal Testimony*, August 25, 2023

**Docket No. 54657** - *Application of the City of Lubbock, Acting by and through Lubbock Power and Light (LP&L) to Change Rates for Wholesale transmission Service, Direct Testimony*, December 8, 2023