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SOAH DOCKET NO. 473-24-13232
PUC DOCKET NO. 56211

APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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PUBLIC REDACTED VERSION

Direct Testimony

of

JEFFRY POLLOCK

On Behalf of

Texas Industrial Energy Consumers

June 19, 2024



J . P O L L O C K
I N C O R P O R A T E D

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AFFIDAVIT OF JEFFRY POLLOCK

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

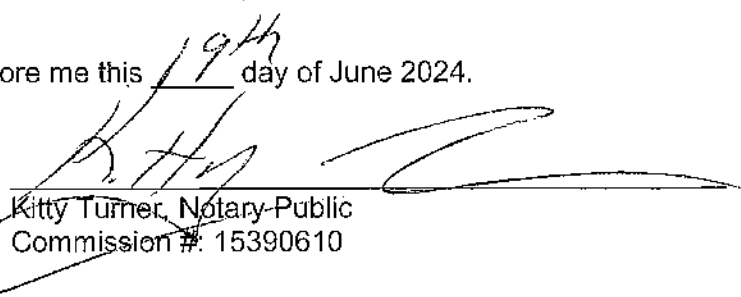
Jeffry Pollock, being first duly sworn, on his oath states:

1. My name is Jeffry Pollock. I am President of J. Pollock, Incorporated, 14323 South Outer 40 Rd., Suite 206N, St. Louis, Missouri 63017. 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 Direct Testimony and Appendices A and B, which have been prepared in written form for introduction into evidence in SOAH Docket No. 473-24-13232 and Public Utility Commission of Texas Docket No. 56211; 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 19th day of June 2024.




Kitty Turner, Notary-Public
Commission #: 15390610

My Commission expires on April 25, 2027.

GLOSSARY OF ACRONYMS

Term	Definition
CAMT	Corporate Alternative Minimum Tax
CenterPoint	CenterPoint Energy Houston Electric, LLC
CIAC	Contribution In Aid of Construction
IRA	Inflation Reduction Act of 2022
kV	Kilovolt
MW	Megawatt(s)
REP	Retail Electric Provider
TDU	Transmission and Distribution Utility
TIEC	Texas Industrial Energy Consumers

DIRECT TESTIMONY OF JEFFRY POLLOCK

1. INTRODUCTION, QUALIFICATIONS AND SUMMARY

1 **Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A Jeffry Pollock; 14323 South Outer 40 Rd., Suite 206N, St. Louis, Missouri 63017.

3 **Q WHAT IS YOUR OCCUPATION AND BY WHOM ARE YOU EMPLOYED?**

4 A I am an energy advisor and President of J. Pollock, Incorporated.

5 **Q PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.**

6 A I have a Bachelor of Science Degree in Electrical Engineering and a Master's in
7 Business Administration from Washington University. Since graduation in 1975, I have
8 been engaged in a variety of consulting assignments, including energy procurement
9 and regulatory matters in both the United States and several Canadian provinces. This
10 includes participating in regulatory proceedings involving CenterPoint Energy Houston
11 Electric, LLC (CenterPoint) and its predecessors, Houston Lighting & Power Company
12 and Reliant Energy (Reliant). More details are provided in **Appendix A** to this
13 testimony. A partial list of my appearances is provided in **Appendix B** to this
14 testimony.

15 **Q ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

16 A I am testifying on behalf of Texas Industrial Energy Consumers (TIEC). TIEC
17 members purchase delivery service from retail electric providers (REPs) under
18 CenterPoint's Transmission Service rate schedule.

1. Introduction, Qualifications
and Summary

1 Q WHAT ISSUES ARE YOU ADDRESSING IN YOUR TESTIMONY?

2 A I am addressing CenterPoint's:

- 3 • Proposal to modify the Transmission Service Rate Schedule Terms of
4 Service to include a Customer Load Study Charge; and
- 5 • Lack of a provision in the Tariff for Retail Delivery Service to allow prorated
6 reimbursement to a transmission customer if CenterPoint repurposes the
7 customer-funded interconnection facilities for use by other customers.
- 8 • Proposed rider to address tax impacts from the Inflation Reduction Act of
9 2022 (Rider IRA).

10 Q ARE YOU ENDORSING CENTERPOINT'S PROPOSALS ON ISSUES NOT
11 ADDRESSED IN YOUR TESTIMONY?

12 A No. One should not interpret my testimony as endorsing CenterPoint's proposals on
13 the issues not addressed.

14 **Summary**

15 Q PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS.

16 A My findings and recommendations are as follows:

17 Customer Load Study Charge

- 18 • CenterPoint is proposing to implement a non-refundable fee ranging from
19 \$50,000 to \$100,000 that would apply only to existing or potentially new
20 transmission voltage service customers that are seeking to add new load.
 - 21 ○ The fee would be mandatory for increases in load of 10 megawatts
22 (MW) or greater. For increases below this threshold, the fee would be
23 at the discretion of CenterPoint or ERCOT.
 - 24 ○ If a fee is required, the customer would be charged \$50,000 for a load
25 study. If CenterPoint or ERCOT determine a stability study is also
26 needed, the affected customer would be charged an additional
27 \$50,000, for a total of \$100,000.
- 28 • Imposing a non-refundable fee on transmission customers to simply find
29 out how much it will cost to interconnect is:
 - 30 ○ Seemingly unprecedented in Texas;
 - 31 ○ Unsupported by the evidence provided by CenterPoint; and

- Will create barriers to collaborative discussions when projects are in the early stages. Further, it will send a signal that this part of Texas is not open to growth.

- For the above reasons, CenterPoint's proposed Customer Load Study Charge should be rejected.
- If, however, the Commission chooses to authorize this fee, the fee should be credited toward any required contribution in aid of construction (CIAC). Additionally, each customer should be allowed up to three interconnection requests per year before the customer would have to pay any fee.

Transmission Line Extension Policy

- CenterPoint's Tariff classifies all transmission extensions as non-standard facilities and all cost required to enable the customer load is borne by the requesting transmission customer through a non-refundable CIAC.¹
- Currently, even though the transmission customer bears all of the CIAC cost, the transmission customer has no recourse if, after the facility is placed into service, CenterPoint repurposes the facility to serve other loads. Specifically, a customer is not refunded any portion of any CIAC they provided if the facility that was funded through their CIAC is subsequently used to service other loads.
- CenterPoint's Tariff should be modified to allow for a prorated refund of a transmission customer's CIAC if, after CenterPoint has placed the customer-funded facility in service, CenterPoint chooses to serve other loads from the same facility.

Rider IRA

- CenterPoint is proposing to implement a new Rider IRA in the event that it becomes subject to the Corporate Alternative Minimum Tax (CAMT) in the future.
- Initially, Rider IRA would be set to \$0.
- The Commission should reject Rider IRA as piecemeal ratemaking.

¹ CenterPoint Tariff for Retail Delivery Service, 6.1.2.2 *Construction Services Policy and Charges*, Sheet 6.16 at 3-4 (Eff. Apr. 23, 2020).

2. CUSTOMER LOAD STUDY CHARGE

1 Q WHAT CHANGE IS CENTERPOINT PROPOSING TO MAKE TO THE TERMS OF
2 SERVICE IN ITS TRANSMISSION SERVICE RATE SCHEDULE?

3 A CenterPoint is proposing to have transmission customers pay a non-refundable fee for
4 CenterPoint to perform a load study on all new and/or additional load for which the
5 customer requests delivery service. Specifically, CenterPoint has asked the
6 Commission to approve the following language for inclusion in CenterPoint's Terms of
7 Service of the Transmission Service Rate Schedule:

8 Company may conduct a load study for Retail Customers requesting Delivery
9 Service under this Rate Schedule for a new load or load addition of 10 MW or
10 more, and Company will charge, and Retail Customer must pay, an additional
11 charge of \$50,000.00 for the load study. The Company will waive this load
12 study requirement and study fee for new loads and load additions of less than
13 10 MW, unless Company or ERCOT determines that a load study is required
14 prior to connecting the new or additional load of less than 10 MW to the
15 Transmission Voltage System. Additionally, if Company or ERCOT require a
16 stability study to be performed, an additional charge of \$50,000.00 will be
17 applied to Retail Customer, for a total of \$100,000.00.²

18 Q IS IT NORMAL FOR TRANSMISSION AND DISTRIBUTION UTILITIES TO
19 PERFORM LOAD STUDIES FOR TRANSMISSION CUSTOMERS EVEN WITHOUT
20 THE PROPOSED CHANGE?

21 A Yes. Load studies are common and they are regularly performed by transmission and
22 distribution utilities (TDUs) like CenterPoint.³ This policy proposal does not appear to
23 be changing that relationship. What is changing is the proposed fee obligation.

² Direct Testimony of John R. Durland, Exhibit JRD-08 at 26.

³ CenterPoint Response to TIEC-RFI04-02.

1 **Q DOES THIS POLICY EXIST ELSEWHERE IN TEXAS?**

2 A I was unable to locate any instance of such a policy, or anything similar thereto,
3 required by any other utility in Texas. In addition, CenterPoint confirmed it was
4 unaware of any other utility in ERCOT which required load and stability study fees.⁴
5 Therefore, this proposed policy appears to be unprecedented in Texas.

6 **Q WHY DOES CENTERPOINT CLAIM IT NEEDS THIS NEW FEE?**

7 A CenterPoint witness, Mr. John R. Durland, states this fee on transmission customers
8 is needed because:

9 CenterPoint Energy saw a *large increase in load customer requests in 2023*.
10 In addition, the sizes of many of the load customer requests were at
11 unprecedented sizes which increases the study complexity greatly as
12 transmission upgrades are much more likely. CenterPoint Energy already
13 charges a fee for generator interconnection studies which require similar
14 studies be performed. CenterPoint Houston has *proposed the Load Study*
15 *Charge to ensure all customers requesting studies are treated equally,*
16 *regardless of whether they are wholesale customers like generators or retail*
17 *customers*. The charge for load customer studies will also *aid in our effort to*
18 *weed out customers requesting a Load Study that do not have serious plans*
19 *to start their project.*⁵ (emphasis added)

20 **Q IS THERE ANYTHING CONCERNING ABOUT THE REASONS GIVEN FOR THE**
21 **PROPOSED CUSTOMER LOAD STUDY FEE?**

22 A Yes. As emphasized in the testimony above, CenterPoint predicates the proposed fee
23 on an increase in interconnection requests in 2023, then attempts to justify the policy
24 as being necessary to ensure that large loads are treated the same as generators.
25 Additionally, CenterPoint believes this fee will aid them in eliminating customers with

⁴ CenterPoint Response to TIEC-RFI04-03.

⁵ Direct Testimony of John R. Durland at 28.

1 non-serious plans to construct. However, these assertions are unsupported and do
2 not warrant the novel, and substantial, proposed fee requirement.

3 **Q IS CENTERPOINT EXPERIENCING AN INCREASE IN TRANSMISSION**
4 **CUSTOMER INTERCONNECTION REQUESTS?**

5 **A** Yes. While CenterPoint does not receive a large number of transmission service
6 interconnection requests each year, in 2023 CenterPoint did experience a 61%
7 increase in the number of transmission service interconnection requests compared to
8 its average over the prior four years.

Table 1 CenterPoint Transmission Interconnection Requests							
Year	2019	2020	2021	2022	2023	2019-2022 Average	2023 % increase
Quantity							61%
Source: TIEC-RFI04-05 Historical Load Study Data 050824 (HSPM)							

9 **Q IS THIS INCREASE IN INTERCONNECTION REQUESTS UNIQUE TO**
10 **CENTERPOINT?**

11 **A** No. Many regions across Texas are experiencing increased load growth which is
12 driving increased transmission network activity.⁶

13 **Q IS THE INCREASE IN TRANSMISSION NETWORK ACTIVITY SOLEY DUE TO**
14 **TRANSMISSION CUSTOMERS?**

15 **A** No. Texas is experiencing load growth in both transmission and distribution
16 customers, as well as a significant amount of generation interconnection requests.

⁶ For example, [ERCOT's 2023 Regional Transmission Plan Report](#) shows the broad nature of the load growth and impacts on transmission system planning.

1 Q IS ADDRESSING INTERCONNECTION REQUESTS A REQUIRED ACTIVITY OF A
2 TRANSMISSION AND DISTRIBUTION UTILITY?

3 A Yes.

4 Q ARE THE COSTS TO ANALYZE INTERCONNECTION REQUESTS A NORMAL
5 EXPENSE INCURRED BY A TRANSMISSION AND DISTRIBUTION UTILITY?

6 A Yes.

7 Q IS THIS ACTIVITY OR COST UNIQUE TO TRANSMISSION CUSTOMERS?

8 A No. As previously stated, all classes are experiencing load growth, in addition to an
9 increased amount of generation interconnection requests.

10 Q IF THIS ACTIVITY IS REQUIRED, NORMAL, AND NOT UNIQUE, SHOULD AN
11 INCREASE IN REQUESTS NECESSITATE A CHANGE IN COST RECOVERY FOR
12 TRANSMISSION CUSTOMERS?

13 A No. An increase in requests does not justify creating a new cost recovery mechanism.

14 Q WHAT IS YOUR CONCERN REGARDING CENTERPOINT'S ASSERTED
15 JUSTIFICATION OF THEIR PROPOSAL BASED ON A PURPORTED NEED TO
16 ENSURE WHOLESALE CUSTOMERS AND RETAIL CUSTOMERS ARE TREATED
17 EQUALLY?

18 A TDUs have an obligation to treat wholesale customers (*i.e.*, generators) and retail
19 customers *fairly* – not equally. Treating them fairly does not translate into charging
20 each the same fees. The Commission should not consider the fact that a load study
21 is part of the interconnection process for both generators and large loads as
22 justification for equal charges.

2. Customer Load Study Charge

1 Q PLEASE EXPLAIN YOUR CONCERN REGARDING CENTERPOINT'S ASSERTION
2 THAT THE PROPOSED FEE IS INTENDED TO HELP MINIMIZE LOAD STUDY
3 REQUESTS BY CUSTOMERS.

4 A As previously stated, Mr. Durland claims the proposed fee will "aid in our effort to weed
5 out customers requesting a Load Study that do not have serious plans to start their
6 project."⁷ Additionally, in discovery CenterPoint noted that under its current policy
7 "[c]ustomers could request the Company to study multiple interconnection locations
8 and varying levels of proposed load, which resulted in additional resources to perform
9 the analysis of the permutations."⁸

10 While I agree it is reasonable for CenterPoint to want to ensure a customer is
11 serious before it begins the load study process (because CenterPoint is subject to
12 prudence and reasonableness in its expenses and, therefore, should seek to efficiently
13 use its resources on behalf of its customers), requiring a customer to pay a minimum
14 \$50,000 fee to "prove" this for each load request is excessive. Further, it is unavoidable
15 that some proposed projects will not come to fruition but that does not mean the
16 sponsors were less than serious about their evaluation.

17 As previously stated, CenterPoint is experiencing load growth from all rate
18 classes, not just transmission service. Thus, requiring only transmission service
19 customers to pay a non-refundable fee when requesting a new or expanded
20 interconnection would also be unduly discriminatory.

⁷ Direct Testimony of John R. Durland at 28.

⁸ CenterPoint Response to TIEC-RFI04-07.

1 Q IS IT REASONABLE FOR CUSTOMERS TO SUBMIT MULTIPLE
2 INTERCONNECTION REQUESTS?

3 A Yes. A business seriously considering an expansion in Texas will have legitimate
4 reasons to evaluate multiple sites before settling on a location. For example, a
5 customer may be considering multiple similar facilities and is trying to find the right
6 strategic growth plan at all of these locations. There could also be external factors at
7 play such as economic development incentives, access to raw materials or feedstocks,
8 and other factors that cause a company to need to keep multiple locations under
9 consideration for some period of time. As another scenario, it may mean a customer
10 is flexible in its growth projections and open to customizing its growth plans around
11 transmission interconnection information. In other words, the customer can be
12 serious, but the planning process may necessitate multiple load studies, some of which
13 may not turn into projects after the load study information is known and factored into
14 their cost/benefit analyses.

15 Q HAS CENTERPOINT PROVIDED PERSUASIVE EVIDENCE OF THE SCOPE OF
16 THE PURPORTED PROBLEM REGARDING LOAD STUDIES BEING REQUESTED
17 BY NON-SERIOUS CUSTOMERS?

18 A No. TIEC requested and obtained through discovery information which provided the
19 total number of transmission voltage interconnection requests and the amount of MW
20 associated with each, but the information required to determine how many customers
21 had requested transmission voltage interconnections was incomplete.⁹

⁹ CenterPoint Response to TIEC-RFI04-05, TIEC-RFI04-05_Historical Load Study Data_050824 (HSPM).

1 Q HAS CENTERPOINT DEFINED AND PROVIDED EVIDENCE OF WHAT
2 CONSTITUTES "MULTIPLE" AND "VARYING" LOAD STUDY REQUESTS FROM
3 A SINGLE CUSTOMER?

4 A No. Presumably as few as two requests could qualify as "multiple" and "varying." I
5 attempted to interpret the incomplete data provided in discovery which was used to
6 create Table 1, but was unable to identify a single customer that made more than one
7 request in the same year.

8 Q WITH SO LITTLE EVIDENCE SUPPORTING THE CLAIMED PROBLEM, IS THERE
9 ANY UPPER BOUNDARY ON THE SIZE OF THE PROBLEM THAT CAN BE
10 REFERENCED TO GUIDE THE COMMISSION'S DECISION ON THIS POLICY?

11 A Yes. Table 1 shows an increase of approximately [REDACTED] requests in 2023 compared to
12 the prior four-year average. Given the significant load growth occurring across all of
13 Texas, it seems reasonable to conclude that most of this increase is due to serious
14 plans for load growth. Therefore, this purported problem is likely only a few load
15 requests at most. Additionally, Table 1 shows that the number of transmission voltage
16 interconnection requests was relatively stable before 2023 and has only been elevated
17 for a single year. This is neither a sustained increase nor does it amount to being a
18 significant increase in the number of transmission voltage interconnection requests to
19 justify implementing a novel fee.

20 Q WHAT DO YOU RECOMMEND?

21 A I recommend the Commission reject the proposed fee. CenterPoint's arguments
22 regarding the quantity of interconnection requests and the purported need to provide
23 equality with generators do not justify imposing a substantial new fee that will create
24 barriers to businesses seeking to locate or expand in CenterPoint's service area.
25 Further, with regard to dissuading purportedly non-serious customers, CenterPoint

2. Customer Load Study Charge

1 has not demonstrated that it has actually received any non-serious load study
2 requests, or that it is experiencing an unreasonable number of non-serious load study
3 requests. Therefore, there is no way to evaluate if charging this new fee would solve
4 anything, much less a problem that has not been demonstrated. Finally, there is no
5 basis to unduly discriminate against transmission customers when CenterPoint is
6 experiencing growth in distribution loads.

7 **Q IF THE COMMISSION STILL APPROVES THE PROPOSED CHANGES TO THE**
8 **TRANSMISSION SERVICE RATE SCHEDULE, DO YOU FORESEE NEGATIVE**
9 **CONSEQUENCES THAT SHOULD BE CONSIDERED AND MINIMIZED?**

10 **A** Yes. If implemented as-is, this policy would treat transmission customers who make
11 one interconnection request the same as transmission customers who make multiple
12 requests. This would unduly punish all potential customers. Further, this will chill the
13 relationship between CenterPoint and transmission customers and also send a signal
14 that this part of Texas is not supportive of economic growth.

15 **Q WHAT IS YOUR RECOMMENDATION TO MINIMIZE THE NEGATIVE**
16 **CONSEQUENCES OF THE PROPOSED FEE?**

17 **A** If the Commission determines that the proposed fee is appropriate, I recommend they
18 modify it such that each transmission customer can request up to three load studies
19 per year before any fee is applied. This allowance will dissuade customers from
20 submitting an undue number of speculative interconnection requests without creating
21 a barrier to customers who are seeking interconnection. Additionally, if a fee is
22 required, it should be credited toward the customer's CIAC if their interconnection
23 project moves forward.

3. TRANSMISSION LINE EXTENSIONS (69KV AND ABOVE)

1 Q WHAT IS CENTERPOINT'S CURRENT FUNDING POLICY REGARDING
2 TRANSMISSION LINE EXTENSIONS?

3 A CenterPoint's current funding policy requires transmission customers to fully pay for
4 any costs to connect their loads to the transmission system. Unlike other customer
5 classes, there is no standard allowance that is credited toward interconnection costs.

6 Q WHAT IS YOUR CONCERN WITH THE CURRENT LINE EXTENSION POLICY?

7 A The policy does not address the circumstance when, after a customer has fully met its
8 obligations to fund through CIAC and CenterPoint has placed the customer-funded
9 facility in service, CenterPoint chooses to serve other loads from the same facility.

10 Q IF CENTERPOINT SUBSEQUENTLY USES A FACILITY THAT WAS FUNDED BY
11 A TRANSMISSION SERVICE CUSTOMER TO SERVE OTHER LOADS, SHOULD
12 THAT CUSTOMER BE COMPENSATED?

13 A Yes. A customer that funds a facility that interconnects its loads with CenterPoint's
14 transmission system should be appropriately compensated in the event that, after the
15 facility is placed in service, CenterPoint uses any of the CIAC-funded facility to serve
16 other loads. Specifically, the customer should be refunded a portion of the CIAC
17 associated with the facility that is subsequently used to serve other loads.

18 Q DOES ANY UTILITY IN TEXAS CURRENTLY HAVE A SIMILAR POLICY?

19 A Yes. Both Entergy Texas, Inc.¹⁰ and AEP Texas Inc. (AEP) have a policy where if a

¹⁰ Entergy Texas, Inc., Section IV Rules and Regulations, *Electric Extension Policy*, Sheet No. 18B, Page 3.5 (Eff. Oct. 17, 2018).

customer-funded facility is used to serve other customers within a set number of years after it is built, the utility may charge a portion of the original customer's CIAC to the new customer(s) and refund that reimbursement to the customer that funded the interconnecting facility. For example, AEP provides the following in Section 6.1.2 of its Tariff for Electric Delivery Service:

If the Company is reimbursed more than \$10,000,000 (including all applicable tax gross-up) by a Customer with respect to a transmission interconnection project, and more transmission customers are served by any or all of the facilities constructed pursuant to that reimbursement within a five-year period following the date in which any equipment is energized by the Company, then the initial Customer that reimbursed the Company shall be entitled to receive a prorated refund of the reimbursement for common facilities when the additional transmission customers execute an agreement for electric service within the five-year period described above. After payment is received from the additional transmission customer(s), a refund of reimbursement for common facilities to the initial Customer will be made on a pro-rata share of the amount initially paid by the initial Customer.¹¹

Q WHAT DO YOU RECOMMEND?

A I recommend that CenterPoint adopt language similar to AEP's Tariff whereby if a customer funds a facility that interconnect its loads with CenterPoint's transmission system, they are appropriately compensated in the event that, after the facility is placed in service, CenterPoint uses any of the CIAC-funded facility to serve other loads.

¹¹ AEP Texas, Tariff for Electric Delivery Service, *Transmission Line Extension (69KV and Above)*, Section 6.1.2 (Eff. Mar. 12, 2021).

4. RIDER IRA

1 Q WHY IS CENTERPOINT PROPOSING RIDER IRA?

2 A CenterPoint is proposing to implement Rider IRA in the event that it becomes subject
3 to additional income taxes under the Corporate Alternative Minimum Taxes (CAMT)
4 provision of the Inflation Reduction Act.

5 Q WAS CENTERPOINT SUBJECT TO ANY CORPORATE ALTERNATIVE MINIMUM
6 TAXES DURING THE TEST YEAR?

7 A No.

8 Q WAS CENTERPOINT SUBJECT TO CORPORATE ALTERNATIVE MINIMUM
9 TAXES DURING THE TEST YEAR?

10 A No. However, CenterPoint expects to be impacted by the CAMT in calendar year
11 2024.¹²

12 Q SHOULD RIDER IRA BE ADOPTED?

13 A No. The only purpose for Rider IRA is to allow CenterPoint to remain whole in the
14 event that it is subject to the CAMT irrespective of any other post-test year changes,
15 such as load growth, that could offset higher expenses. This is a classic example of
16 single-issue (or piecemeal) ratemaking.

¹² Direct Testimony of Lynnae K. Wilson at 23-24.

1 **Q IS PIECEMEAL RATEMAKING AN APPROPRIATE POLICY?**

2 A In general, piecemeal ratemaking is not appropriate because it would allow a utility to
3 adjust future rates without having to demonstrate that rate increases are needed due
4 to an earning deficiency. Further, such piecemeal rate increases are implemented
5 without regard for any other changes that may offset the impact of the higher cost. For
6 example, CenterPoint contends that it has experienced, and will continue to
7 experience, significant load growth. The prospective load growth will generate
8 additional revenues — these additional revenues will offset the impact of additional
9 costs, such as a potential future CAMT. Thus, Rider IRA would unnecessarily enrich
10 CenterPoint by allowing it to recover increases in a particular cost, without also having
11 to recognize potential offsets, such as revenues from load growth.

12 **Q DOESN'T THE COMMISSION HAVE THE AUTHORITY TO AUTHORIZE SPECIFIC**
13 **COST RECOVERY MECHANISMS?**

14 A Yes. The Commission does have authority under PURA to implement various cost
15 recovery mechanisms, such as the Transmission Cost Recovery Factor, Distribution
16 Cost Recovery Factor, Energy Efficiency Cost Recovery Factor and Storm Protection
17 Costs. However, Rider IRA is not one of the cost recovery mechanisms specifically
18 authorized under PURA.

19 **Q WHAT DO YOU RECOMMEND?**

20 A Rider IRA should be rejected.

5. CONCLUSION

1 Q WHAT FINDINGS SHOULD THE COMMISSION MAKE BASED ON YOUR DIRECT
2 TESTIMONY?

3 A The Commission should make the following findings:

- 4 • Reject CenterPoint's Customer Load Study Charge as unprecedented,
5 unsupported by the evidence, and not supportive of economic growth.
- 6 • If, however, the Commission chooses to adopt this fee, the following
7 changes are recommended to minimize the negative consequences of its
8 implementation:
 - 9 ○ Allow each transmission customer up to three interconnection
10 requests per year before the customer would have to pay any fee; and,
 - 11 ○ Apply the fee as a credit to the customer's required CIAC.
- 12 • CenterPoint's Tariff should be modified to facilitate the prorated refund of a
13 transmission customer's CIAC if, within a reasonable time after CenterPoint
14 has placed the customer-funded facility in service, CenterPoint begins
15 serving other loads from the same facility.
- 16 • Reject CenterPoint's request for Rider IRA.

17 Q DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

18 A Yes.

APPENDIX A

Qualifications of Jeffry Pollock

1 **Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A Jeffry Pollock. My business mailing address is 14323 South Outer 40, Suite 206N,
3 Town and Country, Missouri 63017.

4 **Q WHAT IS YOUR OCCUPATION AND BY WHOM ARE YOU EMPLOYED?**

5 A I am an energy advisor and President of J. Pollock, Incorporated.

6 **Q PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.**

7 A I have a Bachelor of Science Degree in Electrical Engineering and a Master's Degree
8 in Business Administration from Washington University. I have also completed a Utility
9 Finance and Accounting course.

10 Upon graduation in June 1975, I joined Drazen-Brubaker & Associates, Inc.
11 (DBA). DBA was incorporated in 1972 assuming the utility rate and economic
12 consulting activities of Drazen Associates, Inc., active since 1937. From April 1995 to
13 November 2004, I was a managing principal at Brubaker & Associates (BAI).

14 During my career, I have been engaged in a wide range of consulting
15 assignments including energy and regulatory matters in both the United States and
16 several Canadian provinces. This includes preparing financial and economic studies
17 of investor-owned, cooperative and municipal utilities on revenue requirements, cost
18 of service and rate design, tariff review and analysis, conducting site evaluations,
19 advising clients on electric restructuring issues, assisting clients to procure and
20 manage electricity in both competitive and regulated markets, developing and issuing

Appendix A

1 requests for proposals (RFPs), evaluating RFP responses and contract negotiation
2 and developing and presenting seminars on electricity issues.

3 I have worked on various projects in 28 states and several Canadian provinces,
4 and have testified before the Federal Energy Regulatory Commission, the Ontario
5 Energy Board, and the state regulatory commissions of Alabama, Arizona, Arkansas,
6 Colorado, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky,
7 Louisiana, Michigan, Minnesota, Mississippi, Missouri, Montana, New Jersey, New
8 Mexico, New York, North Carolina, Ohio, Pennsylvania, South Carolina, Texas,
9 Virginia, Washington, and Wyoming. I have also appeared before the City of Austin
10 Electric Utility Commission, the Board of Public Utilities of Kansas City, Kansas, the
11 Board of Directors of the South Carolina Public Service Authority (a.k.a. Santee
12 Cooper), the Bonneville Power Administration, Travis County (Texas) District Court,
13 and the U.S. Federal District Court.

14 **Q PLEASE DESCRIBE J. POLLOCK, INCORPORATED.**

15 **A** J. Pollock assists clients to procure and manage energy in both regulated and
16 competitive markets. The J. Pollock team also advises clients on energy and
17 regulatory issues. Our clients include commercial, industrial and institutional energy
18 consumers. J. Pollock is a registered broker and Class I aggregator in the State of
19 Texas.

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffry Pollock

UTILITY	ON BEHALF OF	DOCKET	TYPE	STATE / PROVINCE	SUBJECT	DATE
DUKE ENERGY FLORIDA, LLC	Florida Industrial Power Users Group	20240025-EI	Direct	FL	Class Cost-of-Service Study; Class Revenue Allocation; Rate Design	6/11/2024
TAMPA ELECTRIC COMPANY	Florida Industrial Power Users Group	20240026-EI	Direct	FL	Class Cost-of-Service Study; Class Revenue Allocation; Rate Design	6/6/2024
AEP TEXAS INC.	Texas Industrial Energy Consumers	56165	Cross-Rebuttal	TX	Distribution Load Dispatch Expense; Residential Class MDD; LCUST Allocation Factor; Call Center Cost Allocation; Wholesale Distribution Service for Battery Energy Storage System	6/7/2024
TAMPA ELECTRIC COMPANY	Florida Industrial Power Users Group	20240026-EI	Direct	FL	Class Cost-of-Service Study; Class Revenue Allocation; Rate Design	6/6/2024
DOMINION ENERGY SOUTH CAROLINA, INC.	South Carolina Utility Energy Users Committee	2024-34-E	Direct	SC	Class Cost-of-Service Study; Class Revenue Allocation; Rate Design	6/5/2024
DUKE ENERGY FLORIDA, LLC	Florida Industrial Power Users Group	20240013-EG	Direct	FL	Curtailable General Service; Interruptible General Service	6/5/2024
AEP TEXAS INC.	Texas Industrial Energy Consumers	56165	Direct	TX	Transmission Operation and Maintenance Expense; Property Insurance Reserve; Class Cost-of-Service Study; Rate Design; Tariff Changes	5/16/2024
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	55155	Cross-Rebuttal	TX	Turk Remand Refund	5/10/2024
DUKE ENERGY CAROLINAS, LLC	South Carolina Energy Users Committee	2023-388-E	Surrebuttal	SC	Class Cost-of-Service Study; Revenue Allocation and Rate Design	4/29/2024
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	55155	Direct	TX	Turk Remand Refund	4/17/2024
DUKE ENERGY CAROLINAS, LLC	South Carolina Energy Users Committee	2023-388-E	Direct	SC	Class Cost-of-Service Study; Class Revenue Allocation; Rate Design	4/8/2024
GEORGIA POWER COMPANY	Georgia Association of Manufacturers	55378	Direct	GA	Deferred Accounting; Additional Sum; Specific Capacity Additions; Distributed Energy Resource and Demand Response Tariffs	2/15/2024
CENTRAL HUDSON GAS & ELECTRIC	Multiple Intervenors	23-E-0418 23-G-0419	Direct	NY	Electric and Gas Embedded Cost of Service Studies; Class Revenue Allocation; Electric Customer Charge	11/21/2023
SOUTH CAROLINA PUBLIC SERVICE AUTHORITY	Industrial Customer Group	2023-154-E	Direct	SC	Integrated Resource Plan	9/22/2023

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MIDAMERICAN ENERGY COMPANY	Google, LLC and Microsoft Corporation	RPU-2022-0001	Rehearing Rebuttal	IA	Application of Advance Ratemaking Principles to Wind Prime	9/8/2023
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	54634	Cross-Rebuttal	TX	Class Cost-of-Service Study; LGS-T Rate Design; Line Loss Study	8/25/2023
ROCKY MOUNTAIN POWER	Wyoming Industrial Energy Consumers	20000-633-ER-23	Direct	WY	Retail Class Cost of Service and Rate Spread; Schedule Nos. 33, 46, 48T Rate Design; REC Tariff Proposal	8/14/2023
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	54634	Direct	TX	Revenue Requirement; Jurisdictional Cost Allocation; Class Cost-of-Service Study; Rate Design	8/4/2023
DUKE ENERGY CAROLINAS, LLC	Carolina Utility Customers Association, Inc.	E-7, Sub 1276	Direct	NC	Multi-Year Rate Plan; Class Revenue Allocation; Rate Design	7/19/2023
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	22-00286-UT	Direct	NM	Behind-the-Meter Generation; Class Cost-of-Service Study; Class Revenue Allocation; LGS-T Rate Design	4/21/2023
GEORGIA POWER COMPANY	Georgia Association of Manufacturers	44902	Direct	GA	FCR Rate; IFR Mechanism	4/14/2023
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	22-00155-UT	Stipulation Support	NM	Standby Service Rate Design	4/10/2023
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	53931	Direct	TX	Fuel Reconciliation	3/3/2023
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC	RV Industry User's Group	45772	Cross-Answer	IN	Class Cost-of-Service Study; Class Revenue Allocation	2/16/2023
MIDAMERICAN ENERGY COMPANY	Tech Customers	RPU-2022-0001	Additional Testimony	IA	Application of Advance Ratemaking Principles to Wind Prime	2/13/2023
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	54234	Direct	TX	Interim Fuel Surcharge	1/24/2023
NORTHERN INDIANA PUBLIC SERVICE COMPANY LLC	RV Industry User's Group	45772	Direct	IN	Class Cost-of-Service Study; Class Revenue Allocation	1/20/2023
MIDAMERICAN ENERGY COMPANY	Tech Customers	RPU-2022-0001	Surrebuttal	IA	Application of Advance Ratemaking Principles to Wind Prime	1/17/2023
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	54282	Direct	TX	Interim Net Surcharge for Under-Collected Fuel Costs	1/4/2023
DUKE ENERGY PROGRESS, LLC	Nucor Steel - South Carolina	2022-254-E	Surrebuttal	SC	Allocation Method for Production and Transmission Plant and Related Expenses	12/22/2022
NORTHERN STATES POWER COMPANY	Xcel Large Industrials	E002/GR-21-630	Surrebuttal	MN	Cost Allocation; Sales True-Up	12/6/2022

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DUKE ENERGY PROGRESS, LLC	Nucor Steel - South Carolina	2022-254-E	Direct	SC	Treatment of Curtailable Load; Allocation Methodology	12/1/2022
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	22-00155-UT	Rebuttal	NM	Standby Service Rate Design	11/22/2022
MIDAMERICAN ENERGY COMPANY	Tech Customers	RPU-2022-0001	Additional Direct & Rebuttal	IA	Application of Advance Ratemaking Principles to Wind Prime	11/21/2022
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	53719	Cross	TX	Retiring Plant Rate Rider	11/16/2022
NORTHERN STATES POWER COMPANY	Xcel Large Industrials	E002/GR-21-630	Rebuttal	MN	Class Cost-of-Service Study; Distribution System Costs; Transmission System Costs; Class Revenue Allocation; C&I Demand Rate Design; Sales True-Up	11/8/2022
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	53719	Direct	TX	Depreciation Expense; HEB Backup Generators; Winter Storm URI; Class Cost-of-Service Study; Schedule IS; Schedule SMS	10/26/2022
GEORGIA POWER COMPANY	Georgia Association of Manufacturers	44280	Direct	GA	Alternate Rate Plan, Cost Recovery of Major Assets; Class Revenue Allocation; Other Tariff Terms and Conditions	10/20/2022
NEW YORK STATE ELECTRIC & GAS CORPORATION and ROCHESTER GAS AND ELECTRIC CORPORATION	Multiple Intervenors	22-E-0317 / 22-G-0318 22-E-0319 / 22-G-0320	Rebuttal	NY	COVID-19 Impact; Distribution Cost Allocation; Class Revenue Allocation; Firm Transportation Rate Design	10/18/2022
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	22-00155-UT	Direct	NM	Standby Service Rate Design	10/17/2022
NORTHERN STATES POWER COMPANY	Xcel Large Industrials	E002/GR-21-630	Direct	MN	Class Cost-of-Service Study; Class Revenue Allocation; Multi-Year Rate Plan; Interim Rates; TOU Rate Design	10/3/2022
NEW YORK STATE ELECTRIC & GAS CORPORATION and ROCHESTER GAS AND ELECTRIC CORPORATION	Multiple Intervenors	22-E-0317 / 22-G-0318 22-E-0319 / 22-G-0320	Direct	NY	Electric and Gas Embedded Cost of Service Studies; Class Revenue Allocation; Rate Design	9/26/2022
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	22-00177-UT	Direct	NM	Renewable Portfolio Standard Incentive	9/26/2022
CENTERPOINT HOUSTON ELECTRIC LLC	Texas Industrial Energy Consumers	53442	Direct	TX	Mobile Generators	9/16/2022

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ONCOR ELECTRIC DELIVERY COMPANY LLC	Texas Industrial Energy Consumers	53601	Cross-Rebuttal	TX	Class Cost-of-Service Study, Class Revenue Allocation; Distribution Energy Storage Resource	9/16/2022
ONCOR ELECTRIC DELIVERY COMPANY LLC	Texas Industrial Energy Consumers	53601	Direct	TX	Class Cost-of-Service Study; Class Revenue Allocation; Rate Design; Tariff Terms and Conditions	8/26/2022
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	53034	Cross-Rebuttal	TX	Energy Loss Factors; Allocation of Eligible Fuel Expense; Allocation of Off-System Sales Margins	8/5/2022
MIDAMERICAN ENERGY COMPANY	Tech Customers	RPU-2022-0001	Direct	IA	Application of Advance Ratemaking Principles to Wind Prime	7/29/2022
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	53034	Direct	TX	Allocation of Eligible Fuel Expense; Allocation of Winter Storm Uri	7/6/2022
AUSTIN ENERGY	Texas Industrial Energy Consumers	None	Cross-Rebuttal	TX	Allocation of Production Plant Costs; Energy Efficiency Fee Allocation	7/1/2022
AUSTIN ENERGY	Texas Industrial Energy Consumers	None	Direct	TX	Revenue Requirement; Class Cost-of-Service Study; Class Revenue Allocation; Rate Design	6/22/2022
DTE ELECTRIC COMPANY	Gerdau MacSteel, Inc.	U-20836	Direct	MI	Interruptible Supply Rider No. 10	5/19/2022
GEORGIA POWER COMPANY	Georgia Association of Manufacturers	44160	Direct	GA	CARES Program; Capacity Expansion Plan; Cost Recovery of Retired Plant; Additional Sum	5/6/2022
EL PASO ELECTRIC COMPANY	Freeport-McMoRan, Inc.	52195	Cross-Rebuttal	TX	Rate 38; Class Cost-of-Service Study; Revenue Allocation	11/19/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	20-00238-UT	Supplemental	NM	Responding to Seventh Bench Request Order (Amended testimony filed on 11/15)	11/12/2021
EL PASO ELECTRIC COMPANY	Freeport-McMoRan, Inc.	52195	Direct	TX	Class Cost-of-Service Study; Class Revenue Allocation; Rate 15 Design	10/22/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	51802	Cross-Rebuttal	TX	Cost Allocation; Production Tax Credits; Radial Lines; Load Dispatching Expenses; Uncollectible Expense; Class Revenue Allocation; LGS-T Rate Design	9/14/2021
GEORGIA POWER COMPANY	Georgia Association of Manufacturers	43838	Direct	GA	Vogtle Unit 3 Rate Increase	9/9/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	21-00172-UT	Direct	NM	RPS Financial Incentive	9/3/2021

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SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	51802	Direct	TX	Class Cost-of-Service Study; Class Revenue Allocation; LGS-T Rate Design	8/13/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	51802	Direct	TX	Schedule 11 Expenses; Jurisdictional Cost Allocation; Abandoned Generation Assets	8/13/2021
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	51997	Direct	TX	Storm Restoration Cost Allocation and Rate Design	8/6/2021
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	R-2021-3024601	Surrebuttal	PA	Class Cost-of-Service Study; Revenue Allocation	8/5/2021
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	R-2021-3024601	Rebuttal	PA	Class Cost-of-Service Study; Revenue Allocation; Universal Service Costs	7/22/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	20-00238-UT	Supplemental	NM	Settlement Support of Class Cost-of-Service Study; Rate Design; Revenue Requirement.	7/1/2021
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	R-2021-3024601	Direct	PA	Class Cost-of-Service Study; Revenue Allocation	6/28/2021
DTE GAS COMPANY	Association of Businesses Advocating Tariff Equity	U-20940	Rebuttal	MI	Allocation of Uncollectible Expense	6/23/2021
FLORIDA POWER & LIGHT COMPANY	Florida Industrial Power Users Group	20210015-EI	Direct	FL	Four-Year Rate Plan; Reserve Surplus; Solar Base Rate Adjustments; Class Cost-of-Service Study; Class Revenue Allocation; CILC/CDR Credits	6/21/2021
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	20-067-U	Surrebuttal	AR	Certificate of Environmental Compatibility and Public Need	6/17/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	20-00238-UT	Rebuttal	NM	Rate Design	6/9/2021
DTE GAS COMPANY	Association of Businesses Advocating Tariff Equity	U-20940	Direct	MI	Class Cost-of-Service Study; Rate Design	6/3/2021
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	51415	Supplemental Direct	TX	Retail Behind-The-Meter-Generation; Class Cost of Service Study; Class Revenue Allocation; LGS-T Rate Design; Time-of-Use Fuel Rate	5/17/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	20-00238-UT	Direct	NM	Class Cost-of-Service Study; Class Revenue Allocation, LGS-T Rate Design, TOU Fuel Charge	5/17/2021
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	20-067-U	Direct	AR	Certificate of Environmental Compatibility and Public Need	5/6/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	51625	Direct	TX	Fuel Factor Formula; Time Differentiated Costs; Time-of-Use Fuel Factor	4/5/2021

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SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	51415	Direct	TX	ATC Tracker, Behind-The-Meter Generation; Class Cost-of-Service Study; Class Revenue Allocation; Large Lighting and Power Rate Design; Synchronous Self-Generation Load Charge	3/31/2021
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	51215	Direct	TX	Certificate of Convenience and Necessity for the Liberty County Solar Facility	3/5/2021
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	50997	Cross Rebuttal	TX	Rate Case Expenses	1/28/2021
PPL ELECTRIC UTILITIES CORPORATION	PPL Industrial Customer Alliance	M-2020-3020824	Supplemental	PA	Energy Efficiency and Conservation Plan	1/27/2021
CENTRAL HUDSON GAS & ELECTRIC	Multiple Intervenors	20-E-0428 / 20-G-0429	Rebuttal	NY	Distribution cost classification; revised Electric Embedded Cost-of-Service Study; revised Distribution Mains Study	1/22/2020
MIDAMERICAN ENERGY COMPANY	Tech Customers	EPB-2020-0156	Reply	IA	Emissions Plan	1/21/2021
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	50997	Direct	TX	Disallowance of Unreasonable Mine Development Costs; Amortization of Mine Closure Costs; Imputed Capacity	1/7/2021
CENTRAL HUDSON GAS & ELECTRIC	Multiple Intervenors	20-E-0428 / 20-G-0429	Direct	NY	Electric and Gas Embedded Cost of Service; Class Revenue Allocation; Rate Design; Revenue Decoupling Mechanism	12/22/2020
NIAGARA MOHAWK POWER CORP.	Multiple Intervenors	20-E-0380 / 20-G-0381	Rebuttal	NY	AMI Cost Allocation Framework	12/16/2020
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	51381	Direct	TX	Generation Cost Recovery Rider	12/8/2020
NIAGARA MOHAWK POWER CORP.	Multiple Intervenors	20-E-0380 / 20-G-0381	Direct	NY	Electric and Gas Embedded Cost of Service; Class Revenue Allocation; Rate Design; Earnings Adjustment Mechanism; Advanced Metering Infrastructure Cost Allocation	11/25/2020
LUBBOCK POWER & LIGHT	Texas Industrial Energy Consumers	51100	Direct	TX	Test Year; Wholesale Transmission Cost of Service and Rate Design	11/6/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20889	Direct	MI	Scheduled Lives, Cost Allocation and Rate Design of Securitization Bonds	10/30/2020
CHEYENNE LIGHT, FUEL AND POWER COMPANY	HollyFrontier Cheyenne Refining LLC	20003-194-EM-20	Cross-Answer	WY	PCA Tariff	10/16/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	20-00143	Direct	NM	RPS Incentives; Reassignment of non-jurisdictional PPAs	9/11/2020

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ROCKY MOUNTAIN POWER	Wyoming Industrial Energy Consumers	20000-578-ER-20	Cross	WY	Time-of-Use period definitions; ECAM Tracking of Large Customer Pilot Programs	9/11/2020
ROCKY MOUNTAIN POWER	Wyoming Industrial Energy Consumers	20000-578-ER-20	Direct	WY	Class Cost-of-Service Study; Time-of-Use period definitions; Interruptible Service and Real-Time Day Ahead Pricing pilot programs	8/7/2020
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	50790	Direct	TX	Hardin Facility Acquisition	7/27/2020
PHILADELPHIA GAS WORKS	Philadelphia Industrial and Commercial Gas Users Group	2020-3017206	Surrebuttal	PA	Interruptible transportation tariff; Allocation of Distribution Mains; Universal Service and Energy Conservations; Gradualism	7/24/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20697	Rebuttal	MI	Energy Weighting, Treatment of Interruptible Load; Allocation of Distribution Capacity Costs; Allocation of CVR Costs	7/14/2020
PHILADELPHIA GAS WORKS	Philadelphia Industrial and Commercial Gas Users Group	2020-3017206	Rebuttal	PA	Distribution Main Allocation; Design Day Demand; Class Revenue Allocation; Balancing Provisions	7/13/2020
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	2020-3019290	Rebuttal	PA	Network Integration Transmission Service Costs	7/9/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20697	Direct	MI	Class Cost-of-Service Study; Financial Compensation Method; General Interruptible Service Credit	6/24/2020
PHILADELPHIA GAS WORKS	Philadelphia Industrial and Commercial Gas Users Group	2020-3017206	Direct	PA	Class Cost-of-Service Study; Class Revenue Allocation; Rate Design	6/15/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20650	Rebuttal	MI	Distribution Mains Classification and Allocation	5/5/2020
GEORGIA POWER COMPANY	Georgia Association of Manufacturers and Georgia Industrial Group	43011	Direct	GA	Fuel Cost Recovery Natural Gas Price Assumptions	5/1/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20650	Direct	MI	Class Cost-of-Service Study; Transportation Rate Design; Gas Demand Response Pilot Program; Industry Association Dues	4/14/2020
ROCKY MOUNTAIN POWER	Wyoming Industrial Energy Consumers	90000-144-XI-19	Direct	WY	Coal Retirement Studies and IRP Scenarios	4/1/2020
DTE GAS COMPANY	Association of Businesses Advocating Tariff Equity	U-20642	Direct	MI	Class Cost-of-Service Study; Class Revenue Allocation; Infrastructure Recovery Mechanism; Industry Association Dues	3/24/2020

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SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	49831	Cross	TX	Radial Transmission Lines; Allocation of Transmission Costs; SPP Administrative Fees; Load Dispatching Expenses; Uncollectible Expense	3/10/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	19-00315-UT	Direct	NM	Time-Differentiated Fuel Factor	3/6/2020
SOUTHERN PIONEER ELECTRIC COMPANY	Western Kansas Industrial Electric Consumers	20-SPEE-169-RTS	Direct	KS	Class Revenue Allocation	3/2/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	49831	Direct	TX	Schedule 11 Expenses; Depreciation Expense (Rev. Req. Phase Testimony)	2/10/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	49831	Direct	TX	Class-Cost-of-Service Study; Class Revenue Allocation; Rate Design (Rate Design Phase Testimony)	2/10/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	19-00134-UT	Direct	NM	Renewable Portfolio Standard Rider	2/5/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	19-00170-UT	Settlement	NM	Settlement Support of Rate Design, Cost Allocation and Revenue Requirement	1/20/2020
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	49737	Direct	TX	Certificate of Convenience and Necessity	1/14/2020
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	19-00170-UT	Rebuttal	NM	Class Cost-of-Service Study; Class Revenue Allocation	12/20/2019
ALABAMA POWER COMPANY	Alabama Industrial Energy Consumers	32953	Direct	AL	Certificate of Convenience and Necessity	12/4/2019
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	19-00170-UT	Direct	NM	Class Cost-of-Service Study; Class Revenue Allocation; Rate Design	11/22/2019
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	49616	Cross	TX	Contest proposed changes in the Fuel Factor Formula	10/17/2019
GEORGIA POWER COMPANY	Georgia Association of Manufacturers and Georgia Industrial Group	42516	Direct	GA	Return on Equity; Capital Structure; Coal Combustion Residuals Recovery; Class Revenue Allocation; Rate Design	10/17/2019
NEW YORK STATE ELECTRIC & GAS CORPORATION and ROCHESTER GAS AND ELECTRIC CORPORATION	Multiple Intervenors	19-E-0378 / 19-G-0379 19-E-0380 / 19-G-0381	Rebuttal	NY	Electric and Gas Embedded Cost of Service; Class Revenue Allocation; Rate Design	10/15/2019
NEW YORK STATE ELECTRIC & GAS CORPORATION and ROCHESTER GAS AND ELECTRIC CORPORATION	Multiple Intervenors	19-E-0378 / 19-G-0379 19-E-0380 / 19-G-0381	Direct	NY	Electric and Gas Embedded Cost of Service; Class Revenue Allocation; Rate Design; Amortization of Regulatory Liabilities; AMI Cost Allocation	9/20/2019
AEP TEXAS INC.	Texas Industrial Energy Consumers	49494	Cross-Rebuttal	TX	ERCOT 4CPs; Class Revenue Allocation; Customer Support Costs	8/13/2019

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AEP TEXAS INC.	Texas Industrial Energy Consumers	49494	Direct	TX	Class Cost-of-Service Study; Class Revenue Allocation; Rate Design; Transmission Line Extensions	7/25/2019
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Texas Industrial Energy Consumers	49421	Cross-Rebuttal	TX	Class Cost-of-Service Study	6/19/2019
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Texas Industrial Energy Consumers	49421	Direct	TX	Class Cost-of-Service Study; Rate Design; Transmission Service Facilities Extensions	6/6/2019
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	48973	Direct	TX	Prudence of Solar PPAs, Imputed Capacity, treatment of margins from Off-System Sales	5/21/2019
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20322	Rebuttal	MI	Classification of Distribution Mains; Allocation of Working Gas in Storage and Storage	4/29/2019
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20322	Direct	MI	Class Cost-of-Service Study; Transportation Rate Design	4/5/2019
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	49042	Cross-Rebuttal	TX	Transmsision Cost Recovery Factor	3/21/2019
ENTERGY TEXAS, INC.	Texas Industrial Energy Consumers	49057	Direct	TX	Transmsision Cost Recovery Factor	3/18/2019
DUKE ENERGY PROGRESS, LLC	Nucor Steel - South Carolina	2018-318-E	Direct	SC	Class Cost-of-Service Study, Class Revenue Allocation, LGS Rate Design, Depreciation Expense	3/4/2019
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	18-037	Settlement	AR	Testimony in Support of Settlement	3/1/2019
ENERGY+ INC.	Toyota Motor Manufacturing Canada	EB-2018-0028	Updated Evidence	ON	Class Cost-of-Service Study, Distribution and Standby Distribution Rate Design	2/15/2019
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	18-037	Surrebuttal	AR	Solar Energy Purchase Option Tariff	2/14/2019
SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	48847	Direct	TX	Fuel Factor Formulas	1/11/2019
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	18-037	Direct	AR	Solar Energy Purchase Option Tariff	1/10/2019

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