

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

IN THE MATTER OF THE APPLICATION
OF OKLAHOMA GAS AND ELECTRIC
COMPANY FOR AN ORDER OF THE
COMMISSION AUTHORIZING APPLICANT
TO MODIFY ITS RATES, CHARGES, AND
TARIFFS FOR RETAIL ELECTRIC
SERVICE IN OKLAHOMA

Cause No. PUD 200800398



FILED

JUN 22 2009

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CORPORATION COMMISSION
OF OKLAHOMA

RESPONSIVE TESTIMONY

OF

KAREN FORBES, MBA

June 22, 2009

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INTRODUCTION

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

2 A: My name is Karen Forbes. My business address is the Oklahoma Corporation
3 Commission, Public Utility Division, Jim Thorpe Office Building, Room 580, 2101
4 North Lincoln Boulevard, Oklahoma City, Oklahoma, 73105.

5 **Q: What is your occupation and by whom are you employed?**

6 A: I am employed by the Public Utility Division ("PUD") of the Oklahoma Corporation
7 Commission ("OCC" or "Commission") as a public utility regulatory analyst IV in
8 the Economic Analysis Research Division.

9 **Q: Please state briefly your educational background and professional
10 experience.**

11 A: I have a bachelor of science degree in business administration from Oklahoma
12 City University ("OCU") and a master of business administration degree from
13 OCU. I have been employed as a regulatory analyst with PUD since February of
14 1998. See the attached curriculum vitae for a complete listing of my professional
15 credentials.

16 **Q: What are your present duties?**

17 A: My present responsibilities include research and analysis of energy-related
18 matters associated with electric and gas utilities, reviewing of various areas of
19 utility operations and ratemaking issues as well as preparing testimony and
20 recommendations for these areas.

1 **Q: Have you previously testified before this Commission and were your**
2 **qualifications accepted?**

3 A: Yes, I have previously testified before this Commission, and my credentials have
4 been accepted.

PURPOSE

5 **Q: What is the purpose of your testimony in Cause No. PUD 200800398?**

6 A: The instant Cause is a general review of Oklahoma Gas and Electric Company's
7 ("OG&E") rates and charges, including all affiliate and non-affiliate transactions
8 relevant thereto. The purpose of my testimony is to discuss and support Staff's
9 recommendations regarding the appropriate levels for the following areas:

- 10 • vegetation management
- 11 • weather normalization
- 12 • revenue adjustments:
 - 13 ➤ unbilled revenue
 - 14 ➤ special contracts
 - 15 ➤ fuel cost adjustment
 - 16 ➤ true-up of fuel cost adjustment
 - 17 ➤ incremental real time pricing
 - 18 ➤ year end customer
 - 19 ➤ non-Oklahoma adjustments
- 20 • returned check fees

21 Staff's proposed adjustments to these specific areas are presented in Schedule
22 H of Staff's Revenue Requirement Exhibit.

EXECUTIVE SUMMARY

1 My testimony focuses on the following issues:

2 **Vegetation Management:** Staff accepts OG&E's pro forma adjustment of \$4,000,000
3 to adjust the operation and maintenance ("O&M") expense for increased vegetation
4 management in 2009. Of that adjustment, \$3 million is consistent with OG&E's system-
5 hardening goal, outlined in PUD Cause No. 200900387, to achieve a four-year-trim
6 vegetation management cycle. The remaining \$1 million of the pro forma adjustment is
7 reasonable for OG&E's compliance with North American Electric Reliability Corporation
8 ("NERC") transmission standards for transmission line vegetation costs.

9 **Weather Normalization:** Staff accepts OG&E's weather normalization adjustment for
10 weather effects on monthly energy sales and hourly demand included in the cost of
11 service. The Company's adjustment normalized weather kWh and sales for the test
12 year. During the test year, OG&E's customers experienced overall warmer than normal
13 summer weather conditions resulting in a net increase of actual kWh sales and
14 revenues to arrive at the test year adjustment.

15 **Unbilled Revenue:** Staff accepts the Company's treatment of unbilled revenue. The
16 unbilled revenue recorded for the test year ending September 30, 2008, was removed
17 from the amounts included in the cost of service. This pro forma adjustment ensures
18 the estimated revenues associated with the consumption of electricity by customers are
19 removed and the test period booked revenue includes only actual revenue.

1 **Special Contracts:** Staff accepts the Company's adjustment to remove certain special
2 contracts from certain rate classes in the revenue and sales report and reestablish them
3 as separate classes for cost of service study purposes. The adjustment normalizes test
4 year revenues for contracts going forward to properly represent the contract revenue as
5 billed thereby accurately reflecting what will be billed under the standard rate

6 **Fuel Cost Adjustment:** Staff accepts the Company's removal of the fuel cost
7 adjustment ("FCA") from the cost of service. This adjustment is consistent with the
8 OCC approved fuel adjustment clause which allows fuel costs to be recovered through
9 the clause.

10 **True-up of Fuel Cost Adjustment:** This adjustment establishes an appropriate fuel
11 cost based upon the actual cost of fuel for the test year. Staff accepts the Company's
12 true-up fuel cost adjustment.

13 **Incremental Real Time Pricing:** Staff accepts the Company's removal of incremental
14 revenue and kWh associated with the day ahead pricing tariff. Base rates are designed
15 exclusive of incremental revenue and costs. This adjustment resulted in a net revenue
16 increase for the test year.

17 **Year-end Customer:** Staff accepts the Company's year-end customer adjustment.
18 The adjustment changes the revenue and billing units for the entire test year to reflect
19 the customer count and usage level at the last month of the test year.

1 **Non-Oklahoma Adjustments:** Staff accepts the test year, non-Oklahoma revenue
2 adjustment which is comprised of adjustments for non-jurisdictional revenues. This
3 adjustment does not change Oklahoma jurisdiction revenues; rather, it shows that
4 revenues were properly charged to the appropriate jurisdictions.

5 **Returned Check Fees:** Staff proposes a reduction to OG&E's current returned check
6 fees. Current fees are not reflective of the Company's actual bank fees for returned
7 checks. Staff witness, Debbie Prater will address the recommended reduction in
8 greater detail in her direct testimony.

VEGETATION MANAGEMENT

9 **Q: Briefly discuss OG&E's pro forma adjustment W/P H-2-30 for vegetation**
10 **management.**

11 **A:** OG&E's pro forma adjustment W/P H-2-30 for vegetation management adjusts
12 O&M expense for increased vegetation management in 2009. The pro forma
13 adjustment consists of two components: \$3 million for distribution O&M expense;
14 and \$1 million for transmission line vegetation management expense.

15 **Q: Of the \$4 million pro forma adjustment outlined in W/P H-2-30, briefly**
16 **explain why the \$3 million pro forma adjustment associated with**
17 **distribution facilities is needed.**

18 **A:** OG&E increased its distribution vegetation management funding to improve
19 system reliability and safety and to be able to achieve a four-year trim cycle in
20 the future. The proposed pro forma increase is necessary to maintain the four-

1 year trim cycle once achieved. Permitting the increase now will allow OG&E to
2 remain on their tree trimming schedule to achieve a 4-year trim cycle.

3 **Q: What has Staff reviewed in considering the \$3 million distribution portion**
4 **of pro forma adjustment W/P H-2-30?**

5 A: Staff reviewed: OG&E's data request responses supporting distribution
6 vegetation management costs; the direct testimony of Company witnesses and
7 had discussions and meetings with Company personnel regarding the
8 appropriate vegetation costs.

9 **Q: Will OG&E be able to achieve its goal for a four-year trim cycle without the**
10 **proposed \$3 million increase?**

11 A: No. Based on the Company's current spending levels presented in pro forma H-
12 2-30 and a usual approximate two percent (2%) increase every year going
13 forward, without the \$3 million addition OG&E's projection to achieve a 4-year
14 cycle will take until at least 2013 as shown in OG&E's response in Attachment
15 PUDJJ2-1 and also stated in OG&E's response to OIEC's Data Request 7-23 (c).

16 **Q: Briefly explain why the Commission requires a 4-year vegetation**
17 **management trim cycle.**

18 A: Oklahoma Administrative Code (OAC) 165:35-25-15(c) requires electric utilities
19 to achieve a 4-year vegetation management trim cycle for their vegetation
20 management facilities. Staff regards vegetation management as a key

1 component in improving network reliability and dealing with ice storm conditions.
2 Utilizing a 4-year trim cycle mitigates the costs for wind damages and ice storm
3 related conditions.

4 **Q: What is Staff's recommendation regarding the \$3 million distribution**
5 **portion of OG&E's pro forma adjustment W/P H-2-30 for vegetation**
6 **management?**

7 A: Staff supports the Company's \$3 million distribution portion of the pro forma
8 adjustment W/P H-2-30 to increase the O&M expense for vegetation
9 management and believes it should be approved. The distribution portion of the
10 pro forma adjustment along with the System Hardening Program Rider
11 established in PUD Cause No. 200900387 will allow OG&E the opportunity to
12 achieve a four-year trim vegetation management cycle during 2011, two years
13 earlier than planned. Without the \$3 million increase, OG&E anticipates that its
14 distribution system would experience an increasing vegetation management
15 cycle length, lower reliability, and poorer safety conditions for its workers and the
16 public. OG&E also would not attain the four-year trim cycle as required in
17 Oklahoma Administrative Code 165:35-25-15(c) should this pro forma adjustment
18 not be approved.

1 **Q: Of the \$4 million pro forma adjustment outlined in W/P H-2-30, briefly**
2 **explain why the \$1 million pro forma adjustment associated with**
3 **transmission line vegetation management is needed.**

4 A: The Company increased its 2008 budget for transmission line vegetation
5 management funding in direct response to NERC Standard FAC-003-1. The
6 goal of this increase is to ensure that OG&E suffers no tree-related outages on
7 transmission lines designated as critical to the reliability of the electric grid by the
8 Southwest Power Pool ("SPP") and to the respective Regional Reliability
9 Organization ("RRO"). OG&E has approximately 4000 miles of transmission
10 facilities, of which approximately 1600 miles of transmission are subject to the
11 new NERC Vegetation Standard FAC-003-1 that essentially has no tolerance for
12 grow-in tree-related caused outages. If the transmission line trimming is not
13 funded as requested, the risks to OG&E are substantial and could result in
14 substantial NERC fines as well as potential regional outages.

15 **Q: What is Staff's recommendation regarding the \$1 million transmission line**
16 **vegetation management portion of OG&E's pro forma adjustment W/P H-2-**
17 **30 for vegetation management?**

18 A: Based upon Staff's review of supporting documentation and discussions with
19 OG&E personnel, Staff supports the \$1 million transmission line vegetation
20 management portion of OG&E's pro forma adjustment in W/P H-2-30 and
21 believes it should be approved. The increase in vegetation management
22 expenses related to transmission facilities reflects OG&E's need to ensure it has

1 no tree-related outages of transmission lines that have been designated as
2 critical to the reliability of the electric system by the SPP and/or RRO, as
3 mandated by NERC Standard FAC-003-1.

4 **Q: What has Staff reviewed in considering the transmission line vegetation**
5 **management portion of pro forma adjustment W/P H-2-30?**

6 A: Staff reviewed: NERC Vegetation Standard FAC-003-1; testimony of Company
7 witnesses; data request responses for related transmission line vegetation
8 management costs and had discussions and meetings with Company personnel.
9 Staff accepts the pro forma increase for transmission facility expenses, as these
10 costs reduce the probability of having a transmission outage on the designated
11 critical transmission lines, in keeping with the NERC standard.

WEATHER NORMALIZATION

12 **Q: Please briefly discuss OG&E's weather normalization adjustment.**

13 A: The Company's weather normalization adjustment calculates the effect of
14 weather on monthly sales and adjusts the test year's monthly energy sales to
15 reflect normal weather patterns. This adjustment incorporates the effect of both
16 heating and cooling on weather-sensitive customer groups. In addition to
17 weather normalizing monthly energy sales, OG&E also conducted a second
18 analysis to determine the effect of weather on hourly demand and adjusted its
19 test year's hourly demand to reflect normalized weather as well. The Company's
20 weather adjustment was developed from regression analysis of heating and

1 cooling degree-day data. The resulting seasonal weather sensitivity factors are
2 applied to monthly test-period customers and the difference between
3 heating/cooling degree-days and monthly test-period observed heating/cooling
4 degree-days to arrive at the normalized adjustment.

5 **Q: What was OG&E's basis in utilizing normal heating and cooling degree**
6 **days?**

7 A: OG&E based its normal heating and cooling degree days on a rolling 30-year
8 average ending in 2007. In its previous weather normalization analysis, OG&E
9 used a 30-year average based on weather values from 1971 to 2000. Using the
10 rolling 30-year average allowed OG&E to use more recent years of data for
11 weather normalization.

12 **Q: Did OG&E incorporate changes into its weather normalization analysis**
13 **since the last rate case, Cause No. PUD 200500151?**

14 A: Yes. First, OG&E increased the number of years used in its regression model
15 from 12 months (*i.e.*, one year) to five years of historical data. Second, in its
16 weather normalization of hourly energy sales, OG&E used a 30-year rolling
17 weather data to reflect more recent years in determining normal weather. Third,
18 OG&E applied a weather demand allocator to its weather sensitive Service
19 Level-5 customer classes and all FERC customer classes in compliance with the
20 agreement in the PUD Cause No. 200800086, Redbud Joint Stipulation.

1 **Q: Why was the 1-CP methodology used to implement OG&E's weather hourly**
2 **demand?**

3 A: OG&E witness Mr. Bartholomew asserts in his response to Data Request
4 PUDDS 3-2 that:

5 OG&E is using a 1-CP weather normalized production demand
6 allocator because OG&E is a summer peaking utility and plans for
7 and invests in generation assets to meet its annual system peak.
8 This annual system peak planning aligns well with the Southwest
9 Power Pool Inc's reserve margin calculation. Since OG&E plans its
10 generating capacity additions to serve its demand in the peak hour
11 of the year, then the demand of each class in the peak hour is
12 regarded as an appropriate basis for allocating demand-related
13 production costs. Additionally, a weather normalized 1-CP
14 achieves a better smoothing effect than what you try to achieve
15 with non-weather normalized multiple CP's. A 4-CP method that
16 averages the highest peak in each of the four summer months may
17 not accurately reflect the four highest peaks in the summer period
18 because the four highest peaks could actually occur in one month.

19 The option of choosing a 2-CP, 4-CP or some measure of a normal 1-CP
20 demand allocator was given in the Redbud Stipulation, PUD Cause No.
21 200800086. Staff agrees that by using the 1-CP weather normalized demand
22 allocator, it removes the effect of statistical outliers to achieve a smoothing effect
23 rather than using the multiple CP allocators that incorporate test year data,
24 including the outliers and averages them as a part of the methodology.

25 **Q: Have you reviewed the Company's weather adjustment for the test year?**

26 A: Yes. Staff reviewed OG&E's weather data collected from the Will Rogers Airport
27 weather station. Staff also reviewed and verified the degree-days used in the
28 Company's forecast models to arrive at the hourly sales kWh weather impact for

1 the test year. For the weather normalization methodology for hourly demand,
2 Staff reviewed and verified the process applied in creating the weather files
3 which used rank and average processing for normalized temperatures. Staff
4 then reviewed the weather impact kWh which revealed OG&E experienced less
5 kWh sales and revenues in the winter and more kWh sales and revenues in the
6 summer resulting in a test year net of more kWh sales and revenues than
7 normal. The Company's weather revenues were affected by the net increase in
8 the weather kilowatt hours usage for the test year, reflecting overall warmer -
9 than-normal, summer weather conditions.

10 **Q: What is Staff's recommendation for the Company's weather adjustment?**

11 A: The Company's adjustment normalized weather kWh and sales for the test year.
12 During the test year, OG&E's customers experienced overall warmer than normal
13 summer weather, resulting in a net increase of actual kWh sales and revenues to
14 arrive at test year adjustment for (\$19,584,435). Staff accepts OG&E's pro forma
15 weather normalization adjustment.

REVENUE ADJUSTMENTS

UNBILLED REVENUE

16 **Q: What is Staff's recommendation regarding OG&E's accounting treatment of**
17 **the unbilled revenue pro forma adjustment presented in W/P H-2-1 for**
18 **\$5,225,361?**

19 A: The unbilled revenue accrual represents the estimated revenue associated with
20 the consumption of electricity by customers at the end of each month that has not

1 yet been billed and is therefore reversed in the following month. The pro forma
2 removal of the estimated revenues is made to ensure the test period book
3 revenues only include actual revenues. Staff accepts the Company's pro forma
4 adjustment and treatment of unbilled revenues for the test year.

SPECIAL CONTRACTS

5 **Q: Please explain Staff's review process for the Company's pro forma**
6 **adjustment for special contracts presented in W/P H-2-SC for \$3,510,735 .**

7 **A:** Staff reviewed the revenue summary of adjustments to the Company's books,
8 related work papers, and worksheets for the special contracts to verify test year
9 revenues associated with pro forma adjustment H2-SC. Staff also had
10 discussions and met with Company personnel regarding special contracts. The
11 W/P H2-SC pro forma adjustment for special contracts consisted of three
12 contracts. The net of the contracts involved in the adjustment yields traceable
13 revenue for the test year and reestablishes them in separate classes for cost of
14 service study purposes.

15 **Q: What is Staff's position regarding OG&E's pro forma adjustment W/P H-2-**
16 **SC for special contracts?**

17 **A:** Staff accepts the Company's pro forma adjustment W/P H-2-SC for special
18 contracts. OG&E's adjustment involved the net of two of three special contracts.
19 First, the adjustment to Special Contract A moved the aggregate of six points of
20 service and their respective kWh usage by month and block into LPL Service 2

1 due to a customer of Special Contract A exiting the contract in 2009. As a result,
2 Special Contract A was zeroed out, re-billed and added back under the new rate,
3 for both base and fuel revenues. Second, Special Contract C had 181 accounts
4 that involved moving the contract to its respective rate classes: residential,
5 general service, and power and light. W/P H-2-SCa shows test year revenue for
6 Special Contract C split into the three classes using an energy allocator.
7 Therefore, the net of the adjustments made to Special Contracts A and C
8 normalizes test year revenues going forward to properly represent the contract
9 revenue as billed to reflect what will be billed under the new standard rate.
10 Special Contract B reflected no revenue adjustment.

FUEL COST ADJUSTMENT

11 **Q: Does Staff accept OG&E's pro forma adjustment No. H-5 presented in W/P**
12 **H-2-5 for removal of the Oklahoma fuel cost adjustment?**

13 **A:** Yes. Staff accepts the Company's pro forma adjustment to remove the FCA in
14 the amount of \$59,344,314 from the cost of service.

15 **Q: What is the basis for Staff's recommendation to accept the pro forma**
16 **adjustment presented in W/P H-2-5 for removal of the Oklahoma fuel cost**
17 **adjustment?**

18 **A:** Staff reviewed the Company's work papers along with other support
19 documentation provided in Staff's monthly analysis of the FCA . This pro-forma
20 adjustment removes the FCA as billed during the test year.

1 **Q: Is this the normal accounting treatment for the Oklahoma fuel cost**
2 **adjustment?**

3 A: Yes. The FCA as billed includes over and under amounts from prior periods and
4 timing differences due to the two-month lag. Therefore, fuel costs were
5 recalculated to remove the over and under collection and lag amounts. This
6 adjustment resulted in a decrease to jurisdictional revenues of (\$59,844,314).

TRUE-UP OF FUEL COST ADJUSTMENT

7 **Q: Please explain Staff's review process for the Company's pro forma**
8 **adjustment for true-up of fuel cost adjustment presented in W/P H-2-9.**

9 A: Staff reviewed work papers and supporting worksheets and other regulatory
10 related documents. The fuel cost adjustment revenues were based on projected
11 fuel costs in calendar year 2009. The resulting FCA annualized factors were
12 applied to pro forma kWhs by service level to provide the \$167,267,182 pro
13 forma adjustment.

INCREMENTAL REAL TIME PRICING

14 **Q: Briefly discuss OG&E's pro forma adjustment W/P H-2-RTP for \$1,554,310**
15 **to remove incremental, real time pricing from the test year cost of service.**

16 A: Under real time pricing ("RTP") tariffs, electricity consumers are charged prices
17 that vary over short time intervals, typically hourly, and are quoted one day or
18 less in advance to reflect contemporaneous marginal supply costs.

1 **Q: Does Staff accept OG&E's treatment of incremental real time pricing?**

2 A: Based upon Staff's review of tariff sheets, work papers and supporting
3 worksheets, and other regulatory documents, Staff accepts OG&E's removal of
4 incremental sales under RTP from the test year cost of service since they are
5 treated and accounted for outside of OG&E's standard sales process.
6 Incremental sales under RTP are considered to be sales that would not have
7 occurred if the customers were not on the RTP rate. This adjustment ensures
8 that the proper revenue requirements are applied to the entire customer base.

YEAR END CUSTOMER

9 **Q: Briefly discuss OG&E's year-end customer pro forma adjustment**
10 **presented in W/P H-2-8 for \$11,087,083.**

11 A: The year end customer adjustment changes the revenue and billing units for the
12 entire test year to reflect the customer count and usage level at the last month of
13 the test year. This adjustment is necessary to more appropriately reflect year
14 end growth, which is normal regulatory practice. Staff reviewed the pro forma
15 adjustment and the related work papers that supported the billing determinants,
16 customer counts and revenues for the test year. Staff also reviewed the pro
17 forma adjustment for any mathematical discrepancies. Staff accepts the revenue
18 increase for the year-end customer.

NON-OKLAHOMA ADJUSTMENTS

1 **Q: Has Staff reviewed the non-Oklahoma pro forma adjustment outlined in**
2 **W/P H-2-11 for (\$145,138,228)?**

3 **A:** Yes. Staff reviewed the revenue adjustment which was comprised of FERC and
4 other non-related issues that were booked and adjusted by the Company out of
5 the Oklahoma jurisdiction. This adjustment assured revenues were properly
6 charged to the appropriate jurisdictions.

RETURNED CHECK FEES

7 **Q: Are there any revenue-related concerns Staff proposes to address?**

8 **A:** Yes. Staff is proposing that OG&E lower its returned check fee from \$25 to \$10
9 because its current fee is not reflective of actual bank fees for returned checks.
10 Staff witness, Debbie Prater will address this recommendation in greater detail in
11 her direct testimony.

12 I state under penalty or perjury under the laws of Oklahoma that the foregoing is true and correct.

Karen Forbes

(Signature)

6/18/09 Oklahoma City

(Date and Place)

13



Curriculum Vitae Of Karen Forbes

Ms. Forbes is a Regulatory Analyst IV in the Economic Analysis Research Division of the Oklahoma Corporation Commission with eleven years of experience in the areas of utility ratemaking, accounting, rulemaking, research and comparative analysis of public utility issues.

Karen Forbes
Regulatory Analyst IV
Oklahoma Corporation
Commission
580 Jim Thorpe Building
P.O. Box 52000
Oklahoma City, OK 73152
Tel: 405-521-6884
Fax: 405-521-3336
k.forbes@occcemail.com

Professional History
Oklahoma Corporation
Commission
• Regulatory Analyst IV
• Regulatory Analyst III
• Regulatory Analyst II
• Environmental Process
Auditor III

Education
• B.S. business
administration, marketing
major; additional major
coursework in accounting
and some finance, College
of business administration,
Oklahoma City University;
• Master of business
administration, Oklahoma
City University

**Professional
Associations**
• Member of NARUC
Subcommittee on (ERE)
Energy, Resources and
Environment
• Winup organization
• Past licensed with the
National Association of
Securities Dealers with
Series 7.

Particular Areas of Expertise

Vegetation Management/Undergrounding, Weather Normalization, Revenues, Wind and PURPA agreements, renewable energy and expert witness testimony.

Professional Experience

PUD Regulatory Analyst IV

(Economic, Analysis and Research)

- Lead Analyst for tracking vegetation management and overhead to undergrounding conversion from inception to present. Cause Numbers 2005-218 and 2005-515.
- Lead Analyst for weather normalization. Prepared testimony and expert witness.
- Lead on the publication of Electric System Planning Report (ESPR). Published biennially for 2002, 2004, 2006 and mid-year 2008.
- Provided assistance in research and comparative analysis of various group projects – DSM, Decoupling, and Rulemakings.
- Provided expert witness testimony in several major rate cases and several smaller cases before the Oklahoma Corporation Commission.

PUD Regulatory Analyst III

(Energy)

- Lead analyst on monthly review of Fuel Audits for Cooperatives.
- Lead analyst and provided testimony and expert witness for Lost and Unaccounted for Gas (LUFG) for each of the following: Oklahoma Natural Gas (ONG), Oneok Gas Transportation (OGT) 2004, 2005 and LeAnn Gas Company 2005.
- Lead analyst on Wind Generation Causes filed as Qualifying Facilities (QF's) later becoming contract agreements: OG&E's Centennial and Invenergy, AEP- PSO and Blue Canyon Wind Causes and expert witness and testimony.
- Assisted in drafting proposed language for Rulemaking for Affiliate/Financial Transactions related to utilities ensuring consistency between both gas and electric rules.
- Prepared testimony and expert witness and exhibits for Cause No. 2006-151 PSO CCR.
- Prepared recommendation for In-House Training Seminar for a comprehensive view of the existing and future forms and operations of regional electric power system.

PUD Regulatory Utility Regulatory Analyst II

- Researched and performed comparative analysis of public utility issues for Electric Restructuring, other utility issues as directed.
- Reviewed utility application for rate cases. Prepared exhibits, comments, testimony and interrogatories for areas in OG&E and GTE. Areas of expertise: Advertising and Marketing,

PST Environmental Process Auditor

(Petroleum Storage Tank)

- Audited expenses associated with the remediation process for underground storage

tanks to clean up various job sites and field investigations. Performed site visits with Indemnity Fund Hydrologists as directed. Provided investigative skills, attention to detail and very resourceful in developing solutions for problems that evolved.

Professional Training

- National Association of Regulatory Utility Commissioners (NARUC) Utility Rate School
- Institute of Public Utilities – Michigan State University Rate School
- North American Summit on Harmonizing Business Practices in Energy Restructuring (Cosponsored by NARUC and US DOE)
- National Economic Research Associates (NERA) - Marginal Cost Pricing In A Competitive World
- Risk Management Techniques for the Natural Gas Industry
- American Council for an Energy Efficient Economy's (ACEEE) national conference on energy efficiency and reliability
- Expert Witness Training Program
- Revolution OK – Wind Energy Conference, December 2008

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on the 22nd day of June, 2009, a true and correct copy of the above and foregoing was deposited, with postage prepaid thereon, in the U.S. Mail to:

William L. Humes
Elizabeth Ryan
Office of Attorney General
313 NE 21st Street
Oklahoma City, OK 73105

William J. Bullard
Kimber L. Shoop
Patrick D. Shore
OG&E
Post Office Box 321
Oklahoma City, OK 73101-0321

Christopher W. Flynn
Laura M. Earl
Jones Day
77 West Wacker
Chicago, IL 60601

Curtis M. Long,
Fellers, Snider, Blankenship, Bailey & Tippens
The Kennedy Building
321 South Boston, Suite 800
Tulsa, OK 74103-3318

Thomas P. Schroedter
James D. Satrom
Hall Estill Hardwick Gable Golden & Nelson
320 S. Boston, Suite 400
Tulsa, OK 74103

J. Fred Gist
Hall Estill Hardwick Gable Golden &
Nelson
2900 Chase Tower
100 North Broadway
Oklahoma City, OK 73102

Jack G. "Chip" Clark, Jr.
Ronald E. Stakem
Clark Stakem Wood & Patten PC
101 Park Avenue, Suite 400
Oklahoma City, OK 73102

Kendall W. Parrish
Ron Comingdeer & Associates
6011 N. Robinson
Oklahoma City, OK 73118

Shelton L. Benedict
Attorney at Law
406 S. Boulder Avenue, Suite 400
Tulsa, OK 74103

Rick D. Chamberlain
Behrens, Taylor, Wheeler & Chamberlain
6 N. E. 63rd Street, Suite 400
Oklahoma City, OK 73105-1401

Cheryl A. Vaught
Deborah R. Thompson
Vaught & Conner, PLLC.
1900 NW Expressway, Suite 1300
Oklahoma City, OK 73118

