

**BEFORE THE  
CITY OF PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD**

In the Matter of the Philadelphia Water )  
Department's Proposed Changes in Water, ) 2023 General Rate Proceeding  
Sewer and Stormwater Rates and Related )  
Charges )

Direct Testimony and Exhibits  
of  
**BILLIE LACONTE**

On Behalf of

**Philadelphia Large Users Group**

April 12, 2023



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## GLOSSARY OF ACRONYMS

Term	Definition
<b>CCOSS</b>	Class Cost-of-Service Study
<b>PLUG</b>	Philadelphia Large Users Group
<b>PWD</b>	Philadelphia Water Department
<b>Rate Board</b>	City of Philadelphia Water, Sewer and Storm Water Rate Board

**DIRECT TESTIMONY OF BILLIE S. LACONTE**

1 **Introduction, Qualifications and Summary**

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

3 A My name is Billie LaConte. My business address is 12647 Olive Blvd., Suite 585, St.  
4 Louis, Missouri 63141.

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

6 A I am an energy advisor and Associate at J. Pollock, Incorporated.

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

8 A I have a Bachelor of Arts degree in Mathematics from Boston University and a Master's  
9 degree in Business Administration from Washington University. Since graduating from  
10 Washington University in 1995, I have been engaged in a variety of consulting  
11 assignments, including energy procurement and regulatory matters in both the United  
12 States and several Canadian provinces. More details are provided in **Exhibit**  
13 **\_\_\_(BSL-1)**. A list of my appearances is provided in **Exhibit \_\_\_ (BSL-2)**.

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

15 A I am testifying on behalf of the Philadelphia Large Users Group (PLUG). PLUG is an  
16 ad hoc group of large volume customers receiving water, sewer, and stormwater  
17 service from the Philadelphia Water Department (PWD) under the Industrial and  
18 Hospital/University Rate Schedules. PLUG members require substantial volumes of  
19 water in their operations, and the proposed rate increase and tariff modifications may  
20 have an adverse impact upon their operations.

1 Q WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

2 A I am addressing the following issues:

- 3 • The water Class Cost-of-Service Study (CCOSS); and  
4 • The proposed rate increases for large users.

5 **Class Cost-of-Service Study**

6 Q WHAT IS A CLASS COST-OF-SERVICE STUDY?

7 A A CCOSS is an analysis used to determine each class's responsibility for a utility's  
8 costs. Thus, it determines whether the revenue generated by a class covers the  
9 utility's cost of providing service to that class. A CCOSS separates a utility's total costs  
10 into portions incurred on behalf of each customer class. Most of a utility's costs are  
11 incurred jointly to serve many customers. For purposes of revenue allocation and rate  
12 design, customers are grouped into homogenous classes according to their usage  
13 patterns and service characteristics.

14 Q DID PWD SUBMIT CLASS COST-OF-SERVICE STUDIES IN THIS PROCEEDING?

15 A Yes. PWD submitted CCOSSs for the water, wastewater, and stormwater utilities in  
16 PWD Statement No. 7, Direct Testimony of Black and Veatch. I will address the water  
17 CCOSS only. The water CCOSS uses the base-extra capacity method to allocate  
18 costs to each rate class. The base-extra capacity methodology is an accepted practice  
19 and is described in the American Water Works Association's *Principles of Water*  
20 *Rates, Fees, and Charges*, Manual of Water Supply Practices.<sup>1</sup> This methodology  
21 separates costs into four primary cost components: base costs, extra-capacity costs,  
22 customer costs, and fire protection costs.<sup>2</sup>

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<sup>1</sup> American Water Works Association, *Principles of Water Rates, Fees, and Charges*, Manual of Water Supply Practices, Manual of Water Supply Practices – MI at 62-67, 7<sup>th</sup> Edition. (2017).

<sup>2</sup> *Id.* at 62.

1 PWD's CCOSS includes the following customer classes:

<b>Table 1 PWD Customer Classes</b>
<b>Residential</b>
<b>Commercial</b>
<b>Industrial</b>
<b>Public Utilities</b>
<b>Housing Authority</b>
<b>Charity and Schools</b>
<b>Senior Citizens</b>
<b>Hand Bill</b>
<b>Hospitals/University</b>
<b>Public Fire Protection</b>
<b>Private Fire Protection</b>
<b>Wholesale</b>

2 **Q HAVE YOU REVIEWED THE CLASS COST-OF-SERVICE STUDY?**

3 A Yes. I reviewed the CCOSS and its inputs.

4 **Q DO YOU HAVE ANY CONCERNS REGARDING THE CLASS COST-OF-SERVICE**  
5 **STUDY?**

6 A Yes. PWD's proposed CCOSS uses data from previous CCOSSs and rate  
7 proceedings. Specifically, the capacity factor analysis is based on 2018 billing data.

8 **Q DID PLUG REQUEST MORE RECENT USAGE DATA TO UPDATE PWD'S CLASS**  
9 **COST-OF-SERVICE STUDY?**

10 A Yes. PLUG requested updated usage data, by rate class, from calendar years 2021  
11 and 2022, including revised maximum hour and maximum day factors. However, while

1 PWD was able to provide total usage and monthly water usage for FY 2020, 2021,  
2 and 2022, it did not provide actual maximum day and maximum hour factors by  
3 customer class and relied on previous CCOSS data to determine its FY 2024 and FY  
4 2025 rates.<sup>3</sup>

5 **Q SHOULD PWD PROVIDE THIS INFORMATION TO INTERVENORS?**

6 A Yes. The requested data should be available for Intervenors to review. Without this  
7 information, it is difficult, if not impossible, to determine if the proposed rates are  
8 prudent, appropriate, and just and reasonable for each customer class.

9 **Q HAVE YOU REVIEWED THE PROPOSED RATE INCREASES FOR LARGE**  
10 **USERS?**

11 A Yes. Table C-5 in PWD Statement No. 7 provides the proposed rate increases for  
12 various users based on meter size. The increase for users with large meters (1" and  
13 above) are higher (ranging from 12% to 15.5% in fiscal year 2024) than those for  
14 customers with smaller meters and lower usage (ranging from 4.8% to 14.9%).

15 **Q ARE THE PROPOSED RATES FOR THE LARGE CUSTOMERS APPROPRIATE?**

16 A Again, without the proper, most recent usage data, it is impossible to determine if the  
17 allocated costs are appropriate. Without the most recent class maximum day and  
18 class maximum hour data, PLUG cannot properly review the CCOSS and the  
19 proposed rates to ensure that the proposed rate increases by size are cost-based and  
20 fair.

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<sup>3</sup> PWD Response to PLUG 1-1.

1 Q WHAT DO YOU RECOMMEND?

2 A I recommend that the Rate Board direct PWD to provide the necessary information so  
3 Intervenors may determine if the proposed rates are reasonable. Relying on stale data  
4 may distort the allocated costs and misrepresent the proper rate for each rate class.

5 Q DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

6 A Yes.



**Qualifications of Billie S. LaConte**

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

2 A Billie S. LaConte. My business mailing address is 12647 Olive Blvd., Suite 585, St.  
3 Louis, Missouri 63141.

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

5 A I am an energy advisor and am currently employed by J. Pollock, Incorporated as  
6 Associate Consultant.

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

8 A I have a Bachelor of Arts Degree in Mathematics from Boston University and a  
9 Master's degree in Business Administration from Washington University.

10 Upon graduation in May 1995, I joined Drazen Consulting Group, Inc. (DCGI).  
11 DCGI was incorporated in 1995 assuming the utility rate and economic consulting  
12 activities of Drazen Associates, Inc., active since 1937. I joined J.Pollock in May 2015.

13 During my tenure at DCGI and J.Pollock my work has focused on revenue  
14 requirement issues, cost of capital (return on equity and capital structure), cost  
15 allocation, rate design, sales and price forecasts, power cost forecasting, electric  
16 restructuring issues, integrated resource plans, formula rate plans, asset management  
17 agreements and contract interpretation.

18 I have been engaged in a wide range of consulting assignments including  
19 energy and regulatory matters in both the United States and several Canadian  
20 provinces. This has included advising clients on economic and strategic issues  
21 concerning the natural gas pipeline, oil pipeline, electric, wastewater and water  
22 utilities. I have prepared cost allocation and rate design studies to provide timely

1 support to clients engaged in settlement negotiations in electric and gas utilities,  
2 provided power cost forecasting studies to assist clients in project planning and  
3 negotiated contracts with electric utilities for standby services and interruptible rates.  
4 I have also prepared studies on electric and gas utilities' performance-based rates  
5 (PBR) and benchmarking programs to evaluate their success and to provide  
6 recommendations on methods to be used. I worked on contract interpretation to  
7 resolve contract disputes for several clients. I have provided financial and cost of  
8 service analysis for natural gas pipelines certificate approval from the Federal Energy  
9 and Regulatory Commission (FERC) and the Canadian National Energy Board (NEB).  
10 Additionally, I completed the Corporate Credit Rating Analysis course presented by  
11 Moody's Analytics.

12 I have worked on various projects located in many states and several Canadian  
13 provinces including Alberta, British Columbia, Saskatchewan, Nova Scotia and  
14 Quebec. I have testified before the state regulatory commissions of Arkansas, Florida,  
15 Georgia, Iowa, Louisiana, Michigan, Minnesota, Missouri, New Mexico, Pennsylvania,  
16 Texas and South Carolina, and the provincial regulatory boards of Alberta and Nova  
17 Scotia. I similarly have appeared before the St. Louis Metropolitan Sewer District  
18 Commission.

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

20 A J. Pollock assists clients to procure and manage energy in both regulated and  
21 competitive markets. The J. Pollock team also advises clients on energy and  
22 regulatory issues. Our clients include commercial, industrial and institutional energy  
23 consumers. J. Pollock is a registered Class I aggregator in the State of Texas.

**Testimony Filed in Regulatory Proceedings  
by Billie S. LaConte**

UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
DUKE ENERGY PROGRESS, LLC	Nucor Steel - South Carolina	2022-254-E	Surrebuttal	SC	Regulatory Asset Amortization Periods	12/22/2022
NORTHERN STATES POWER	Xcel Large Industrials	E002/GR-21-630	Surrebuttal	MN	Return on Equity; Prepaid Pension Asset; Incentive Compensation; Coal Plant Amortization	12/6/2022
DUKE ENERGY PROGRESS, LLC	Nucor Steel - South Carolina	2022-254-E	Direct	SC	Coal Combustion Residual Amortization; Other Regulatory Asset Amortization	12/1/2022
NORTHERN STATES POWER	Xcel Large Industrials	E002/GR-21-630	Rebuttal	MN	Incentive Compensation; Prepaid Pension Asset	11/8/2022
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Settlement Support	AR	Support of Settlement	11/2/2022
GEORGIA POWER COMPANY	Georgia Association of Manufacturers	44280	Direct	GA	Return on Equity; Capital Structure	10/20/2022
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Direct	AR	Projected Year Feeder Level Investment Plan; Power Through Program	10/5/2022
NORTHERN STATES POWER	Xcel Large Industrials	E002/GR-21-630	Direct	MN	Return on Equity; Incentive Compensation; Pre-Paid Pension Asset	10/3/2022
ONCOR ELECTRIC DELIVERY COMPANY LLC	Texas Industrial Energy Consumers	53601	Direct	TX	Self-Insurance Reserve; Annual Storm Expense; Regulatory Asset Amortization	8/26/2022
PENNSYLVANIA-AMERICAN WATER COMPANY	Pennsylvania-American Large Water Users Group	R-2022-3031672/73	Rebuttal	PA	Revenue Requirement Allocation; Class Cost-of-Service Study	8/19/2022
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	R-2022-3031113	Surrebuttal	PA	Design Day Demand; Rate Differentials	8/4/2022
PENNSYLVANIA-AMERICAN WATER COMPANY	Pennsylvania-American Large Water Users Group	R-2022-3031672/73	Direct	PA	Wasterwater Subsidy and Allocation; Revenue Stabilization Mechanism; Customer Classification; Revenue Requirement Scale Back	7/29/2022
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	R-2022-3031113	Rebuttal	PA	Class Cost-of-Service Study; Scale Back of Rates; Design Day Demand; Rate Differentials; Universal Service Programs	7/21/2022
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	R-2022-3031113	Direct	PA	Class Cost-of-Service Study; Class Revenue Allocation	6/22/2022
AUSTIN ENERGY	Texas Industrial Energy Consumers	None	Direct	TX	Cash Flow Method; Financial Metrics; General Fund Transfer; Internally Generated Funds	6/22/2022
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-21148	Rebuttal	MI	Uncollectible Expense; Rate Stability Target	4/29/2022
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-21148	Direct	MI	Return on Equity, Capital Structure; Renewable Natural Gas Plant; Incentive Compensation; Transportation Demand Charge; Gas Curtailment and Requirements for Plant Protection; Unauthorized Gas Usage Charge	4/8/2022
SEMCO ENERGY GAS COMPANY	Association of Businesses Advocating Tariff Equity	U-21169	Direct	MI	Facilities Improvement Demand Surcharge	3/18/2022
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Settlement Support	AR	Support of Settlement	10/27/2021

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UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
EL PASO ELECTRIC COMPANY	Freeport-McMoRan Copper & Gold, Inc.	52195	Direct	TX	Return on Equity; Nuclear Non-Fuel Operation and Maintenance; Rate Case Expense; Retiring Generating Units	10/22/2021
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Direct	AR	Projected Year Capital Additions; Projected Year O&M expense	10/5/2021
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	R-2021-3024601	Surrebuttal	PA	Return on Equity; Post-Test Year Adjustment	8/5/2021
CENTERPOINT ENERGY ARKANSAS GAS	Arkansas Gas Consumers, Inc.	21-044-U	Direct	AR	Formula Rate Plan Extension; Return on Equity; Class Cost-of-Service Study	7/19/2021
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	R-2021-3024601	Direct	PA	Return on Equity; Post-Test Year Adjustment	6/28/2021
FLORIDA LIGHT & POWER COMPANY	Florida Industrial Power Users Group	20210015-EI	Direct	FL	Cost of Capital; Early Plant Retirement; Rate Case Expense Amortization; Income Tax Change Mechanism	6/21/2021
DTE GAS COMPANY	Association of Businesses Advocating Tariff Equity	U-20940	Direct	MI	Return on Equity; Operation and Maintenance Expenses; Incentive Compensation	6/3/2021
SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	20-00238-UT	Direct	NM	Rate Design, Retired Plant, Expense Amortization	5/17/2021
PHILADELPHIA WATER DEPARTMENT	Philadelphia Large Users Group	Fiscal Years 2022-2023	Rebuttal	PA	Class Cost-of-Service Study; Stormwater Incentive Program	4/7/2021
SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	51415	Direct	TX	Early Plant Retirement; Excess Accumulated Deferred Federal Income Taxes; Self-Insurance Reserve; Imputed Capacity	3/31/2021
SHARYLAND UTILITIES, L.L.C.	Texas Industrial Energy Consumers	51611	Direct	TX	Rate-Case Expenses; Operation and Maintenance Expense; Transmission Cost of Service Refund Rider	3/8/2021
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	2020-3018929	Surrebuttal	PA	Revenue Allocation; Rate Design	2/9/2021
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	2020-3018929	Rebuttal	PA	Allocation of Distribution Mains; Revenue Allocation; Rate Design; Universal Service Fund Charge	1/19/2021
PECO ENERGY COMPANY	Philadelphia Area Industrial Energy Users Group	2020-3018929	Direct	PA	Class Cost-of-Service Study; Class Revenue Allocation	12/22/2020
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Surrebuttal (FRP Extension)	AR	FRP Extension; Return on Equity; Capital Structure; Class Cost-of-Service Study; Industrial Rate Design	11/17/2020
PENNSYLVANIA-AMERICAN WATER COMPANY	Pennsylvania-American Large Water Users Group	2020-3019369 2020-3019371	Surrebuttal	PA	Rate Design; Regionalization and Consolidation Surcharge; Return on Equity	10/20/2020
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Direct (FRP Extension)	AR	FRP Extension; Return on Equity; Capital Structure; Class Cost-of-Service Study; Industrial Rate Design	10/19/2020
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Direct (2020 Eval. Report)	AR	Historical Year Netting Adjustment; Long-Term Debt Costs	10/5/2020
PENNSYLVANIA-AMERICAN WATER COMPANY	Pennsylvania-American Large Water Users Group	2020-3019369 2020-3019371	Rebuttal	PA	Rate Design	9/29/2020
PENNSYLVANIA-AMERICAN WATER COMPANY	Pennsylvania-American Large Water Users Group	2020-3019369 2020-3019371	Direct	PA	Regionalization and Consolidation Surcharges; Commercial Rate Design	9/8/2020

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UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20697	Rebuttal	MI	Financial Compensation Mechanism; Deferred Capital Spending Recovery Mechanism; Karn 1 & 2 Retention and Separation costs, return on equity, storm restoration deferral; PowerMIFleet Pilot Foundational Infrastructure Program; Conservation Voltage Reduction	7/14/2020
CENTERPOINT ENERGY RESOURCES CORP	Arkansas Gas Consumers, Inc.	17-010-FR	Direct	AR	Projected Year Capital Expenditures; Capitalization Policy; Projected Year Adjustments	7/2/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20697	Direct	MI	Return on Equity; Capital Structure; Debt Cost; Additional Surcharges and Deferred Regulatory Accounts	6/24/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20650	Rebuttal	MI	Return on Equity; Statistical Analysis of Distribution Mains Allocation	5/5/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20650	Direct	MI	Return on Equity; Capital Structure; Long-Term Debt Cost	4/14/2020
DTE GAS COMPANY	Association of Businesses Advocating Tariff Equity	U-20642	Rebuttal	MI	Return on Equity	4/14/2020
DTE GAS COMPANY	Association of Businesses Advocating Tariff Equity	U-20642	Direct	MI	Return on Equity; Operation and Maintenance Expenses	3/24/2020
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20618	Direct	MI	Certificate of Convenience and Necessity	1/17/2020
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Settlement Support	AR	Support of Settlement	10/30/2019
GEORGIA POWER COMPANY	Georgia Association of Manufacturers and Georgia Industrial Group	42516	Direct	GA	Alternate Rate Plan; Coal Combustion Residual Cost Recovery; Amortization of Retired Plant	10/17/2019
ENTERGY ARKANSAS, LLC	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Direct	AR	Tax Cuts and Jobs Act Impact; Projected Year Revenues; Projected Year BRORB; Grid Modernization; Advanced Metering Infrastructure Expense	10/4/2019
SOUTHWESTERN ELECTRIC POWER COMPANY	Western Arkansas Large Energy Consumers	19-008-U	Surrebuttal	AR	SWEPCO's Formula Rate Review; Energy Cost Recovery Rider; Distribution Reliability Rider	9/24/2019
CENTERPOINT ENERGY RESOURCES CORP	Arkansas Gas Consumers, Inc.	17-010-FR	Settlement Support	AR	Support of Settlement	7/31/2019
SOUTHWESTERN ELECTRIC POWER COMPANY	Western Arkansas Large Energy Consumers	19-008-U	Direct	AR	SWEPCO's Formula Rate Review; Capital Structure; Distribution Reliability Rider; Arkansas Formula Rate Plans	7/16/2019
CENTERPOINT ENERGY RESOURCES CORP	Arkansas Gas Consumers, Inc.	17-010-FR	Direct	AR	Formula Rate Plan, Capital Additions, Operation and Maintenance Expenses	7/2/2019
ENTERGY LOUISIANA, LLC	Occidental Chemical Corporation	U-35130	Cross-Answering	LA	Fuel Tracking Mechanism	7/1/2019
CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Texas Industrial Energy Consumers	49421	Direct	TX	Unprotected Excess Deferred Income Tax Rider; Incentive Compensation	6/6/2019
ENTERGY LOUISIANA, LLC	Occidental Chemical Corporation	U-35130	Direct	LA	Fuel Tracking Mechanism	5/10/2019
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20322	Rebuttal	MI	Return on Equity	4/29/2019
CENTERPOINT ENERGY RESOURCES CORP	Arkansas Gas Consumers, Inc.	18-057	Supplemental Surrebuttal	AR	Gas Distribution Upstream Services Contracting Process	4/23/2019

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UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
CENTERPOINT ENERGY RESOURCES CORP	Arkansas Gas Consumers, Inc.	18-057	Surrebuttal	AR	Gas Distribution Upstream Services Contracting Process	4/12/2019
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20322	Direct	MI	Return on Equity; Capital Structure; Project vs. Historical Test Year; Earnings Sharing Mechanism	4/5/2019
DUKE ENERGY PROGRESS, LLC	Nucor Steel - South Carolina	2018-318-E	Direct	SC	Excess Deferred Income Tax Rider; Post-Test Year Adjustments; Coal Ash Pond Closure Expense; End-of-Life Nuclear Costs; Regulatory Assets; Return on Equity and Equity Ratio	3/4/2019
CENTERPOINT ENERGY RESOURCES CORP	Arkansas Gas Consumers, Inc.	18-057	Direct	AR	Gas Distribution Upstream Services Contracting Process	2/12/2019
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Settlement Support	AR	Support of Settlement	10/30/2018
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Direct	AR	Formula Rate Plan Tariff; Long-Term Debt Cost and Preferred Equity; Projected Year Capital Additions; Historical Year Capital Additions	10/4/2018
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20134	Rebuttal	MI	Return on Equity	10/1/2018
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-20134	Direct	MI	Return on Equity, Capital Structure and Long-Term Debt Cost, Investment Recovery Mechanism Excess Sharing Mechanism	9/10/2018
CENTERPOINT ENERGY RESOURCES CORP	Arkansas Gas Consumers, Inc.	17-010-FR	Opposition	AR	Opposition to Settlement Agreement	8/3/2018
CENTERPOINT ENERGY RESOURCES CORP	Arkansas Gas Consumers, Inc.	17-010-FR	Direct	AR	Impact of Tax Cuts and Jobs Act of 2017; Forecast Revenues; Uncollectible Expense; Pipeline Integrity Assessment and Remediation Expense	7/2/2018
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	17-052	Surrebuttal	AR	Utility Restructuring Costs and Tax Effects	5/31/2018
PUBLIC SERVICE COMPANY OF NEW MEXICO	City of Farmington, New Mexico; Board of County Commissioners for San Juan County	17-00174	Direct	NM	Integrated Resource Plan; Future of San Juan Generation Station	5/4/2018
ENTERGY ARKANSAS, INC. and CENTERPOINT ENERGY ARKANSAS GAS	Arkansas Electric Energy Consumers, Inc. and Arkansas Gas Consumers, Inc.	18-006	Direct	AR	Effect on Revenue Requirement due to 2017 Tax Cuts and Jobs Act	3/29/2018
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U18424	Rebuttal	MI	Rate of Return	3/21/2018
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	18-014-TF	Direct	AR	Impact of Tax Cuts and Jobs Act of 2017 and Tax Adjustment Rider	3/19/2018
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-18424	Direct	MI	Rate of Return, Capital Structure	2/28/2018
CENTERPOINT ENERGY ARKANSAS GAS	Arkansas Gas Consumers, Inc.	17-050-U	Surrebuttal	AR	Asset Management Agreement Proposal	1/12/2018
CENTERPOINT ENERGY ARKANSAS GAS	Arkansas Gas Consumers, Inc.	17-050-U	Direct	AR	Asset Management Agreement Proposal	12/8/2017
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Settlement Support	AR	Support of Settlement	10/31/2017

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UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Direct	AR	Forecast Revenues, Cost of Debt, Revenue Requirement and Capital Additions	10/4/2017
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-18322	Rebuttal	MI	Return on Equity	9/7/2017
CONSUMERS ENERGY COMPANY	Association of Businesses Advocating Tariff Equity	U-18322	Direct	MI	Return on Equity, Capital Structure	8/10/2017
CENTERPOINT ENERGY RESOURCES CORP	Arkansas Gas Consumers, Inc.	17-010-FR	Settlement Support	AR	Support of Settlement	7/31/2017
CENTERPOINT ENERGY RESOURCES CORP	Arkansas Gas Consumers, Inc.	17-010-FR	Direct	AR	Rate of Return, Capital Structure, Labor Expense	7/3/2017
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Settlement Support	AR	Support of Settlement	10/24/2016
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	16-036-FR	Direct	AR	Rate of Return, Forecast Revenue, Capitalization	9/30/2016
METROPOLITAN EDISON COMPANY; PENNSYLVANIA ELECTRIC COMPANY AND WEST PENN POWER	MEIUG, PICA and WPPII	2016-2537349, 2016-2537352, 2016-2537359	Surrebuttal	PA	Return on Equity	8/31/2016
METROPOLITAN EDISON COMPANY; PENNSYLVANIA ELECTRIC COMPANY AND WEST PENN POWER	MEIUG, PICA and WPPII	2016-2537349, 2016-2537352, 2016-2537359	Direct	PA	Return on Equity	7/22/2016
NORTHERN STATES POWER	Xcel Large Industrials	15-826	Direct	MN	Return on Equity, Multi-Year Rate Plan	6/14/2016
CENTERPOINT ENERGY RESOURCES CORP	Arkansas Electric Energy Consumers, Inc.	15-098-U	Surrebuttal	AR	Return on Equity, Formula Rate Plan, Capital Structure	6/7/2016
CENTERPOINT ENERGY RESOURCES CORP	Arkansas Electric Energy Consumers, Inc.	15-098-U	Direct	AR	Return on Equity, Captial Structure	4/14/2016
MISSOURI-AMERICAN WATER COMPANY	BJC Healthcare	WR-2011-0337	Rebuttal	MO	Return on Equity	1/19/2012
MISSOURI-AMERICAN WATER COMPANY	BJC Healthcare	WR-2011-0337	Direct	MO	Return on Equity	11/17/2011
METROPOLITAN ST. LOUIS SEWER DISTRICT	Barnes-Jewish Hospital	N/A	Supplemental	MO	Rate Model	9/16/2011
METROPOLITAN ST. LOUIS SEWER DISTRICT	Barnes-Jewish Hospital	N/A	Surrebuttal	MO	Rate Increase, CIRP, Consent Decree	8/19/2011
METROPOLITAN ST. LOUIS SEWER DISTRICT	Barnes-Jewish Hospital	N/A	Rebuttal	MO	Rate Increase, CIRP, Consent Decree	7/18/2011
AMEREN UE	Missouri Energy Group	ER-2011-0028	Surrebuttal	MO	Return on Equity, Energy Efficiency Cost Recovery	4/15/2011
AMEREN UE	Missouri Energy Group	ER-2011-0028	Rebuttal	MO	Return on Equity, Energy Efficiency Cost Recovery	3/25/2011
AMEREN UE	Missouri Energy Group	ER-2011-0028	Direct	MO	Return on Equity	2/8/2011
AMEREN UE	Missouri Energy Group	EO-2010-0255	Direct	MO	Prudence Audit of FAC Periods 1 and 2	11/22/2010
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	09-084-U	Direct - In Support	AR	Supporting the Proposed Settlement Agreement	5/11/2010

**Testimony Filed in Regulatory Proceedings  
by Billie S. LaConte**

UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	09-084-U	Surrebuttal	AR	Return on Equity	4/14/2010
ENTERGY ARKANSAS, INC.	Arkansas Electric Energy Consumers, Inc.	09-084-U	Direct	AR	Return on Equity	2/26/2010
AMEREN UE	Missouri Energy Group	ER-2010-0036	Direct	MO	Energy Efficiency Costs	12/18/2009
AMEREN UE	Missouri Energy Group	ER-2008-0318	Surrebuttal	MO	Return on Equity	11/5/2008
AMEREN UE	Missouri Energy Group	ER-2008-0318	Direct	MO	Return on Equity, Off-System Sales	8/28/2008
METROPOLITAN ST. LOUIS SEWER DISTRICT	Missouri Energy Group	N/A	Rebuttal	MO	Long-Term Financial Plan, Capital Financing	5/2/2007
AMEREN UE	Missouri Energy Group	ER-2007-0002	Surrebuttal	MO	Return on Equity, Interruptible Demand, Response Pilot	2/27/2007
AMEREN UE	Missouri Energy Group	ER-2007-0002	Direct	MO	Interruptible Rate	12/29/2006
AMEREN UE	Missouri Energy Group	ER-2007-0002	Direct	MO	Return on Equity, Off-System Sales, Sharing Mechanism, 10% Cap on Residentials	12/15/2006
AMEREN UE	Missouri Energy Group	EA-2005-0180	Rebuttal	MO	Economic Analysis	1/31/2005
NOVA SCOTIA POWER INC.	Avon Valley Greenhouses	NSUAR-P-881	Direct	NS	Cost of Capital	10/12/2004
MISSOURI-AMERICAN WATER COMPANY	Missouri Energy Group	WR-2003-0500	Surrebuttal	MO	Working Capital, Return on Equity, Cost Allocation	12/5/2003
MISSOURI-AMERICAN WATER COMPANY	Missouri Energy Group	WR-2003-0500	Rebuttal	MO	Rate Design	11/10/2003
MISSOURI-AMERICAN WATER COMPANY	Missouri Energy Group	WR-2003-0500	Direct	MO	Return on Equity, Acquisition Adjustment, Cash Working Capital	10/3/2003
METROPOLITAN ST. LOUIS SEWER DISTRICT	Missouri Energy Group	N/A	Direct	MO	Revenue Requirement, Financial Planning	4/22/2003
INTERSTATE POWER AND LIGHT COMPANY	Lee County Energy Users Group- Direct	RPU-02-3	Surrebuttal	IA	Revenue Requirement, Return on Equity	9/19/2002
METROPOLITAN ST. LOUIS SEWER DISTRICT	Missouri Energy Group	N/A	Surrebuttal	MO	Revenue Requirement, Capital Financing	8/13/2002
METROPOLITAN ST. LOUIS SEWER DISTRICT	Missouri Energy Group	N/A	Surrebuttal	MO	Revenue Requirement, Capital Financing, Cost Allocation	7/28/2002
INTERSTATE POWER AND LIGHT COMPANY	Lee County Energy Users Group- Direct	RPU-02-3	Direct	IA	Revenue Requirement, Return on Equity	7/26/2002
METROPOLITAN ST. LOUIS SEWER DISTRICT	Missouri Energy Group	N/A	Rebuttal	MO	Revenue Requirement, Capital Financing	7/10/2002