

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Fuel and Purchased Power Cost
Recovery Clause With Generating
Performance Incentive Factor**

**DOCKET NO. 140001-EI
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**DIRECT TESTIMONY AND CONFIDENTIAL EXHIBITS OF
JEFFRY POLLOCK**

**ON BEHALF OF
THE FLORIDA INDUSTRIAL POWER USERS GROUP**

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TABLE OF CONTENTS

LIST OF ACRONYMS	3
DIRECT TESTIMONY OF JEFFRY POLLOCK	4
Summary	5
Projected Benefits and Costs	6
Policy Issues	13
APPENDIX A	23
APPENDIX B	25

LIST OF ACRONYMS

Term	Definition
BCF	Billion Cubic Feet
EIA	Energy Information Administration
Enable	Enable Gas Transmission, LLC
FIPUG	Florida Industrial Power Users Group
FPL	Florida Power & Light Company
Fuel Clause	Fuel and Purchased Power Cost Recovery Clause
G&A	General and Administrative
kWh	Kilowatt Hour
NorthWestern	NorthWestern Energy
NPV	Net Present Value
SSHP	Southeast Supply Header Pipeline

DIRECT TESTIMONY OF JEFFRY POLLOCK

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

2 A Jeffrey Pollock, 12647 Olive Blvd., Suite 585, St. Louis, MO 63141.

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 Masters in
7 Business Administration from Washington University. Since graduation in 1975, I
8 have been engaged in a variety of consulting assignments, including energy
9 procurement and regulatory matters in both the United States and several
10 Canadian provinces. My qualifications are documented in **Appendix A**. A partial
11 list of my appearances is provided in **Appendix B** to this testimony.

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

13 A I am testifying on behalf of the Florida Industrial Power Users Group (FIPUG).
14 Numerous FIPUG members purchase electricity from Florida Power & Light
15 Company (FPL) under various rate schedules. They require a reliable affordably-
16 priced supply of electricity to power their operations. FIPUG members who
17 receive electrical service from FPL have substantial interests that will be affected
18 by FPL's proposal to incur costs associated with the proposed acquisition, and
19 include those costs in rates that they (and other FPL customers) will pay if FPL's
20 Petition is approved.

21 **Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

22 A My testimony addresses FPL's proposal seeking determinations that:

- 1 • It is prudent to acquire an interest in the Woodford Gas Reserves
2 Project (Woodford or Project);
- 3 • The revenue requirements associated with investing in and
4 operating Woodford are eligible for recovery through the Fuel and
5 Purchased Power Cost Recovery Clause (Fuel Clause); and
- 6 • FPL’s proposed Gas Reserves Guidelines should be adopted by
7 the Commission to determine whether FPL should invest in future
8 natural gas reserve acquisitions without a formal review.¹

9 **Q ARE YOU SPONSORING ANY EXHIBITS WITH YOUR TESTIMONY?**

10 A Yes. I am sponsoring **Exhibits JP-1** through **JP-4**. These exhibits were
11 prepared by me or under my supervision and direction.

12 **Q ARE YOU ADDRESSING ALL ASPECTS OF FPL’S PETITION?**

13 A No. However, the fact that I am not addressing certain aspects of FPL’s Petition
14 should not be interpreted as an endorsement of its proposals, and any
15 suggestion to the contrary is misplaced.

16 **Summary**

17 **Q PLEASE SUMMARIZE YOUR FINDINGS AND RECOMMENDATIONS.**

18 A Put simply, FPL will benefit more from its investment in Woodford than its
19 customers. Further, there is no assurance that customers will benefit at all. If
20 the customers’ benefits should materialize, those benefits will be minimal and not
21 significantly affect customers’ electricity costs. Although FPL’s benefits are
22 virtually guaranteed, the benefits to FPL’s customers are uncertain and will
23 depend on the future market value of natural gas and the operating costs
24 incurred to produce and deliver the gas to FPL.

¹ Exhibit SF-9.

1 As a first of its kind project for a vertically integrated electric utility, the

2 Project raises broad policy considerations, such as:

- 3 • Whether it is appropriate for FPL to use ratepayer-supplied capital
4 to make a 50-year investment in a more risky business (*i.e.*
5 natural gas extraction) than running an electric utility;
- 6 • Whether Fuel Clause recovery, where FPL is guaranteed to
7 recover its investment and a full regulatory return on Woodford (or
8 other similar gas reserve projects), provides appropriate
9 incentives for FPL to maximize the benefits to FPL's customers;
- 10 • Whether the Commission has the proper tools to appropriately
11 oversee FPL's management of Woodford and other gas reserve
12 acquisitions; and
- 13 • Whether there are any other unknown risks for which customers
14 would be solely responsible over the 50-year assumed Project life.

15 Accordingly, with only speculative and minimal customer benefits, and without
16 clear answers to these important policy questions in its proposed Gas Reserves
17 Guidelines, the Commission should reject FPL's arguments and deny its Petition.

18 If the Commission approves the Petition, any general and administrative
19 (G&A) expenses charged to FPL should be recovered in base rates.

20 **Projected Benefits and Costs**

21 **Q WHY IS FPL ASKING THE COMMISSION TO APPROVE ITS PETITION?**

22 A FPL states that the Project would allow it to purchase natural gas in-kind at
23 actual production cost rather than in the market place at market prices. FPL
24 asserts that customers could benefit because it projects that actual production
25 costs will be below future natural gas market prices.² As discussed later,
26 customer benefits are highly uncertain.

² Petition at 5-6.

1 **Q WHAT FACTORS WILL DRIVE THE ECONOMICS OF THE WOODFORD**
2 **PROJECT?**

3 A The economics of FPL's investment in the Project will critically depend upon:

- 4 • The market value of the gas produced at Woodford, which in turn
5 will depend on projected natural gas prices; and,
- 6 • FPL's ability to manage the production costs and the costs of
7 gathering and transporting natural gas from Woodford to the
8 Southeast Supply Header Pipeline (SSHP).

9 **Q HOW WOULD FPL'S CUSTOMERS POSSIBLY BENEFIT FROM FPL'S**
10 **INVESTMENT IN THE WOODFORD PROJECT?**

11 A FPL's customers would benefit, but only if the all-in costs of producing, gathering,
12 transporting and managing the gas supply from Woodford, including
13 compensating FPL for and providing a return on its investment, is below the
14 market value of the natural gas produced.

15 **Q HAVE YOU REVIEWED FPL'S COST-BENEFIT ANALYSIS?**

16 A Yes. FPL presented a cost-benefit analysis for the 50-year estimated life of
17 Woodford. The results of FPL's cost-benefit analysis are summarized in the
18 table below.

Woodford Project Summary of Sensitivity Scenarios (\$Million NPV)³			
Production Sensitivity	Pricing Sensitivity		
	Low Case	Base Case	High Case
Low	(\$14.4)	\$72.6	\$159.5
Base	\$10.3	\$106.9	\$203.5
High	\$34.1	\$140.4	\$246.7

³ Direct Testimony of Sam Forrest at 38.

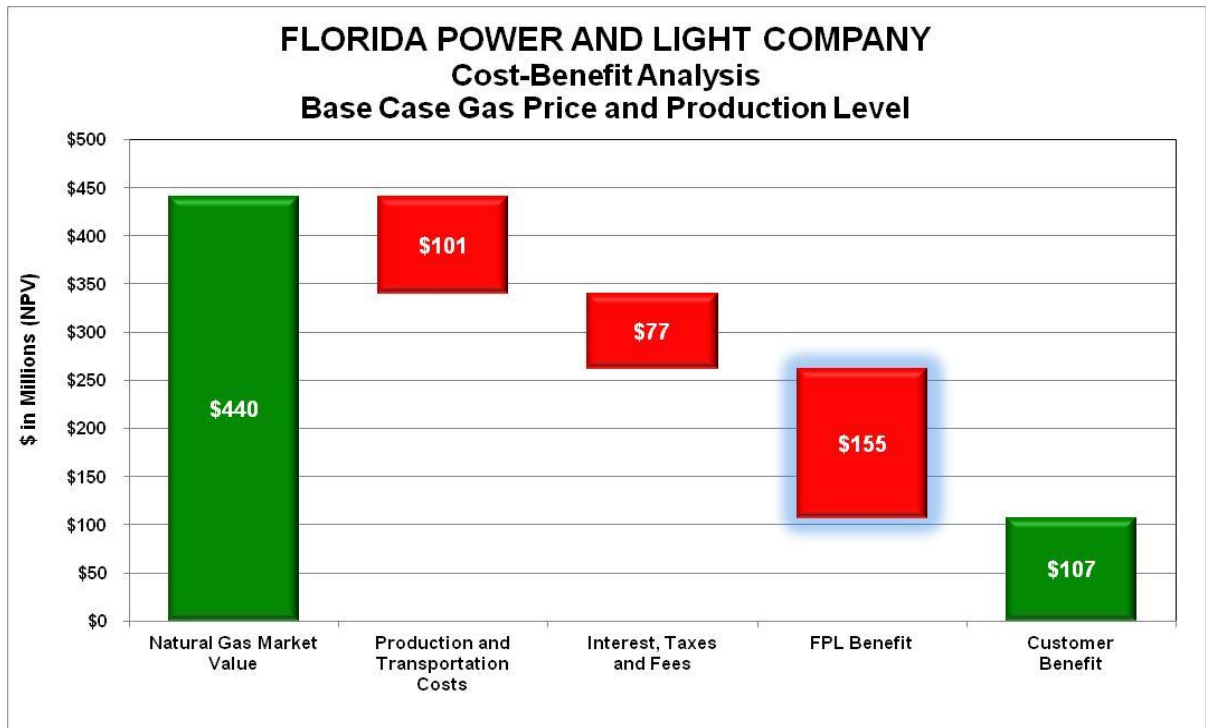
1 As can be seen, FPL conducted a base case and various sensitivity cases that
2 reflect different production levels (*i.e.*, Production Sensitivity), as well as different
3 natural gas pricing assumptions (*i.e.*, Pricing Sensitivity). FPL projects customer
4 benefits ranging from -\$14.4 million (low natural gas pricing and low production
5 levels) to \$246.7 million (high natural gas pricing and high production levels).
6 FPL expects net benefits of \$107 million (*i.e.* base case pricing and production
7 levels). However, FPL's sensitivity analysis indicates the customers' benefits are
8 unclear and uncertain, while FPL's benefits are clear and certain.

9 **Q ARE THE PROJECTED FPL CUSTOMER BENEFITS SIGNIFICANT?**

10 A No, not really in the context of what FPL is seeking. As discussed later, the
11 projected \$107 million net present value (NPV) benefits for FPL's customers
12 would result in a savings of only 1.3¢ per 1,000 kilowatt hours (kWh).

13 **Q IF FPL IS PROJECTING ONLY MINIMAL CUSTOMER BENEFITS THEN WHY**
14 **IS IT INTERESTED IN INVESTING IN THE WOODFORD PROJECT?**

15 A FPL will not only recover its incremental expenses (*i.e.*, production,
16 transportation, interest, taxes and G&A), it will benefit by recovering its
17 investment (*i.e.*, depletion) while earning a regulated return on the equity portion
18 of its investment. The latter are clearly benefits to FPL and its shareholders. As
19 can be seen, FPL's base case projections show that the FPL benefit would be
20 \$155 million NPV. This is in contrast with a customer benefit of \$107 million
21 NPV.



- 1 The corresponding results under the low and high gas price scenarios are shown
- 2 in the table below.

Woodford Project Cost-Benefit Analysis Base Case Production (\$Million NPV)			
Component	Base Case Gas Price	Low Gas Price Case	High Gas Price Case
Market Value	\$440	\$344	\$537
Production Cost	\$23	\$23	\$23
Transportation Cost	\$78	\$78	\$78
Interest, Taxes and G&A	\$77	\$77	\$77
FPL Benefits	\$155	\$155	\$155
Customer Benefits	\$107	\$10	\$204
Projected Net Energy For Load (GWh)*	7,998,616		
Net Benefit Per 1,000 kWh	1.3¢	0.1¢	2.5¢
Source: FPL's Response to OPC POD 12 (Confidential) and POD 34 * FPL's 2014 Ten Year Site Plan, Schedule 2.3, trended to 2065.			

1 **Q PLEASE EXPLAIN THE COMPONENTS OF THE COST-BENEFIT ANALYSIS.**

2 A Market value reflects the projected cost of purchasing natural gas in the market.
3 Production costs are the costs incurred for exploration, drilling, and extracting
4 natural gas. Transportation costs include “gathering” to move the gas from the
5 producing fields to the pipeline and transportation from the pipeline to FPL.
6 Interest, taxes and G&A expenses include FPL’s debt financing costs, taxes
7 (including income tax on FPL’s equity return) and the fees charged to FPL to
8 manage the Project. FPL benefits include the return of FPL’s investment as well
9 as the return on the equity portion of this investment. Customer benefits are the
10 difference between market value and sum of the direct operating costs (*i.e.*,
11 production, transportation, interest, taxes and G&A) and FPL benefits.
12 Essentially, FPL’s customers would receive the remaining market value, if any,
13 after taking into account direct operating expenses and FPL benefits.

14 **Q WOULD THE FPL BENEFITS VARY UNDER ANY OF THE SCENARIOS THAT**
15 **FPL MODELED IN ITS COST-BENEFIT ANALYSIS?**

16 A No. As shown in the above table, the FPL benefits would remain constant across
17 all gas price scenarios. The same is also true across all production level
18 scenarios. In other words, FPL’s cost recovery proposal would ensure that it
19 recovers its investment and earns its full return on equity irrespective of whether
20 FPL’s customers receive any benefits. As discussed later, the risk of investing in
21 natural gas extraction are considerable. Thus, guaranteeing FPL full recovery of
22 its investment, a fixed return on equity regardless of the outcome, while not
23 providing similar guaranteed benefits to FPL’s customers, would not be in the
24 public interest.

1 **Q DO YOU HAVE ANY CONCERNS ABOUT FPL'S COST-BENEFIT ANALYSIS?**

2 A Yes. First, as can be seen in the above table, production and transportation
3 costs account for \$101 million of the projected total cost. Transportation costs
4 assume that FPL would transport gas through the Enable Gas Transmission,
5 LLC (Enable) system to the SSHP. However, in estimating these costs, FPL
6 assumed no escalation of either production or transportation costs. Further, FPL
7 conducted no sensitivity analysis using different assumptions for either
8 production or transportation costs.

9 **Q IS IT REASONABLE TO ASSUME THAT PRODUCTION AND**
10 **TRANSPORTATION COSTS WILL NOT CHANGE DURING THE PROJECTED**
11 **50-YEAR LIFE OF THE WOODFORD PROJECT?**

12 A No. For example, it is unreasonable to expect that Enable will not seek to
13 increase transportation rates over the 50 year projected life. In fact, Enable has
14 not had a rate case to adjust its base transportation rates since 1996. With all of
15 the investment that Enable (and its predecessors, CenterPoint Energy Gas
16 Transmission and NorAm) has made to expand its system, it is only a matter of
17 time before it seeks a substantial rate increase.

18 **Q HOW WOULD THE NET BENEFITS BE AFFECTED IF PRODUCTION AND**
19 **TRANSPORTATION COSTS WERE ESCALATED AT A HIGHER RATE THAN**
20 **FPL ASSUMED?**

21 A This is shown in **Exhibit JP-1**. As can be seen, applying a 2% per year
22 escalation rate to production and transportation costs increases the direct
23 operating costs by \$16 million NPV under FPL's base case production and gas
24 price scenarios.

1 **Q DO YOU HAVE ANY OTHER CONCERNS WITH FPL'S COST-BENEFIT**
2 **ANALYSIS?**

3 A Yes. As previously stated, the assumed market value of the natural gas
4 produced at Woodford is a key assumption in determining whether FPL's
5 customers will realize any benefits. FPL's forecast of natural gas prices,
6 however, was based on market conditions that existed on October 7, 2013.⁴ A
7 more current forecast is presented in **Exhibit JP-2**, column 1. This updated
8 forecast used the most recent 30-day average closing price of Henry Hub futures
9 contracts through the year 2026, and subsequent years were escalated based on
10 a long-term forecast conducted by the Energy Information Administration (EIA).
11 For comparison, FPL's projected natural gas prices are also shown (column 2).
12 As can be seen, gas prices have moved downward since last October.

13 **Q HOW WOULD USING A MORE CURRENT NATURAL GAS PRICE**
14 **FORECAST AFFECT THE COSTS AND BENEFITS OF THE WOODFORD**
15 **PROJECT?**

16 A The impact is shown in **Exhibit JP-3**. Using the current natural gas price
17 forecast shown in **Exhibit JP-2**, the customer benefit would decline to \$27 million
18 NPV. In other words, updating just the natural gas forecast reduces the
19 projected customer benefit by \$80 million NPV. Despite the lower projected
20 benefits, FPL would continue to earn \$155 million in benefits from Woodford.

21 **Q IN YOUR VIEW WILL CUSTOMERS BENEFIT FROM THE PROJECT?**

22 A No. Although there may be potential benefits for FPL's customers, they are
23 unclear and uncertain. For example, assuming a 2% per year escalation rate in

⁴ Response to Staff Interrogatory No. 21.

1 both production and transportation costs and making use of the more recent
2 natural gas price forecast, customer benefits would be only \$11 million NPV.
3 Should any benefits materialize, they are too small to compensate for the
4 significant risks that customers would bear.

5 **Q DOES FPL'S COST-BENEFIT ANALYSIS DEMONSTRATE THAT INVESTING**
6 **IN THE WOODFORD PROJECT IS IN THE PUBLIC INTEREST?**

7 A No. FPL is providing no guarantees that FPL customers will realize tangible
8 benefits from the Project. However, the one constant is that FPL will recover its
9 investment and earn a full regulatory return, regardless of the benefits (if any)
10 that FPL's customers ultimately realize. Allowing FPL to venture into natural gas
11 exploration and extraction also allows FPL to expand its rate base in non-
12 traditional ways, a tactic that may benefit FPL shareholders, but holds only
13 marginal and questionable benefit for FPL's customers. Thus, FPL's proposal
14 fails to balance the interests of FPL and its customers. For this reason, it should
15 be rejected.

16 **Policy Issues**

17 **Q DOES FPL'S PETITION RAISE ANY POLICY ISSUES?**

18 A Yes. The Project would be the first of its kind for a large vertically integrated
19 electric utility. Thus, FPL's Petition raises important policy issues and
20 unanswered questions. Among the broader policy issues are:

- 21
- 22 • Should the Commission approve investments that provide a virtual
23 guaranteed benefit to the utility as an incentive to reduce fuel
24 costs?
 - 25 • Should a fully regulated integrated electric utility be allowed to
26 become more vertically integrated by investing in natural gas
producing fields?

- 1 • Does the Commission have the proper tools to properly oversee
2 FPL's management of an unrelated business?
- 3 • Should a regulated utility be allowed to invest in a more risky
4 business without also subjecting its shareholders to higher risks?
- 5 • Should the Commission adopt FPL's proposed guidelines for
6 participating in future ventures as the PSC guidelines?

7 Among the questions unanswered by its Petition are:

- 8 • How should FPL's customers be compensated for any "upstream"
9 sales of natural gas?
- 10 • If the cost of gas from Woodford (or other similar gas reserve
11 projects) were to become uneconomical, should FPL continue to
12 recover its investment and earn a full regulatory return?

13 **Q IS IT IN THE PUBLIC INTEREST TO GUARANTEE FPL A BENEFIT TO**
14 **PROVIDE AN INCENTIVE TO LOWER FUEL COSTS?**

15 A No. FPL has an obligation to provide reliable service at the lowest reasonable
16 cost. This obligation includes procuring and managing natural gas and other
17 production inputs in a prudent and reasonable manner that also benefits
18 customers.

19 **Q DOES FUEL CLAUSE RECOVERY PROVIDE A STRONG INCENTIVE TO**
20 **DELIVER TANGIBLE BENEFITS TO FPL'S CUSTOMERS?**

21 A No. Allowing full cost recovery in the Fuel Clause will not ensure that FPL's
22 customers actually receive benefits from the Project.

23 **Q HAS FPL COMMITTED TO PROVIDE SUPPLEMENTAL INFORMATION THAT**
24 **WILL ALLOW THE COMMISSION TO EVALUATE THE BENEFITS TO**
25 **CUSTOMERS?**

26 A No. FPL proposes to supplement its Fuel Clause filings to include support for the
27 costs incurred. Although this will allow the Commission to verify the accuracy of
28 the costs, the supplemental information would provide no guidance on how well

1 the Project is being managed or whether it is producing tangible benefits to FPL
2 customers.

3 Further, FPL is under no obligation to periodically determine whether the
4 Project has provided or will provide real benefits to customers despite changing
5 circumstances. In other words, customers have no assurance whatsoever that
6 they have actually received any benefits or that they will likely benefit in the
7 future from either Woodford or similar future gas reserve projects.

8 **Q WHAT ARE THE POLICY IMPLICATIONS OF FPL'S ACQUISITION OF THE**
9 **WOODFORD PROJECT?**

10 A FPL's acquisition of Woodford would expand FPL's utility operations to include
11 natural gas exploration and extraction. Currently, FPL controls electricity
12 generation, delivery and sales to retail customers. The Woodford acquisition
13 would give FPL control over the production of a portion of the natural gas used
14 for generation. However, natural gas extraction is not a similar business to FPL's
15 other utility operations. Further, this Commission has no direct regulatory
16 authority over, or experience overseeing natural gas exploration and extraction.
17 Commission oversight would clearly be more difficult in this case given that
18 Woodford is nearly 1,000 miles from FPL's service area.

19 Thus, in the absence of direct regulatory authority over a new segment of
20 FPL's business, the Commission may need new and better tools to ensure that
21 FPL properly manages and oversees an unrelated business venture that will
22 clearly benefit FPL, but may not benefit FPL's customers. It also means that FPL
23 should have to meet higher standards to justify the recovery of all costs incurred
24 at Woodford (or similar projects), including whether Woodford is being managed
25 and operated at a level comparable to peer natural gas extraction operations.

1 Without these additional tools, and absent requiring FPL to demonstrate the
2 prudence and reasonableness of the management of the Project relative to
3 prudent industry practices, and that Woodford is providing tangible benefits to
4 FPL's customers, the proposed acquisition would not be in the public interest.

5 **Q WHY ELSE IS THIS A CONCERN?**

6 A Unlike investing in a related business to an integrated investor-owned electric
7 utility, natural gas exploration and extraction is a risky proposition. As evidence
8 of the much higher risk, PetroQuest, the operator of Woodford, has a bond rating
9 below investment grade. FPL is a strong A-rated company.

10 PetroQuest's lower bond rating reflects the numerous risks associated
11 with natural gas extraction. For example, recoverable reserves and/or future
12 production levels may be either greater or less-than expected. The same holds
13 true with the level of future actual production, gathering and transportation
14 expense. There are also environmental risks associated with natural gas
15 fracking. In particular, the chemicals used in the fracking process could
16 contaminate the ground water. Oklahoma, where the project in question is
17 located, has also seen an increase in seismic activity that some suggest may be
18 attributable to natural gas fracking. This raises questions of who bears the
19 ultimate responsibility for any remediation costs as well as any ongoing legal
20 liability. These risks are asymmetric because 75% of the benefits (*i.e.*, gas
21 supply) from the Project will have been realized in just one-third of Woodford's
22 projected 50-year life.

1 **Q WHY SHOULD THE COMMISSION BE CONCERNED ABOUT THE SALE OF**
2 **ANY UPSTREAM NATURAL GAS?**

3 A Although FPL states that all of the in-kind gas will be used to generate electricity
4 in FPL's footprint, there is a possibility that some or all of the natural gas
5 produced at Woodford could be sold into the market. However, if the sale price
6 is not at or above cost, which also includes FPL's depreciation and return on
7 equity, FPL's customers would be unnecessarily subsidizing these market sales.
8 In other words, FPL customers would bear the risk of these losses. The
9 Commission should not sanction a policy that forces FPL's customers to
10 subsidize upstream market natural gas sales.

11 **Q WHY SHOULD THE COMMISSION BE CONCERNED ABOUT COST**
12 **RECOVERY IN THE EVENT THAT THE GAS FROM FPL'S ACQUISITION(S)**
13 **BECOMES UNECONOMICAL?**

14 A FPL's cost recovery proposal, which locks in the recovery of FPL's investment
15 and a return on equity, would shift all of the Project risk to its customers.
16 However, FPL's customers should only bear risk to the extent that they can also
17 have a reasonable opportunity to realize the benefits of the investment that they
18 are underwriting. Thus, the Commission must not absolve FPL's shareholders of
19 any risks associated with the investment in Woodford (or similar future gas
20 reserve projects). FPL must have "skin in the game" to ensure a proper
21 allocation of risk and to provide incentives to deliver savings to FPL customers.

22 **Q DO FPL'S PROPOSED GUIDELINES ADDRESS THE ABOVE ISSUES?**

23 A No. The proposed guidelines do not address the sharing of risks between FPL
24 and FPL's customers particularly if the gas supply were to become uneconomical

1 or if other as yet unknown risks are encountered. Nor do they impose an
2 ongoing obligation on FPL to demonstrate that FPL customers have benefitted
3 and will benefit from acquiring natural gas reserves.

4 **Q WHY SHOULD THE COMMISSION GIVE MORE CAREFUL CONSIDERATION**
5 **TO THESE POLICY ISSUES AND UNANSWERED QUESTIONS?**

6 A Although FPL touts that it is not the first electric utility to invest in a working gas
7 production field, there is little precedent to draw upon for guidance.

8 **Q PLEASE EXPLAIN.**

9 A Only one other electric utility, NorthWestern Energy (NorthWestern), has
10 received approval to invest in a working natural gas field. **Exhibit JP-4** is a press
11 release downloaded from NorthWestern's web site describing NorthWestern's
12 purchase of the Battle Creek natural gas field.

13 **Q ARE THE CIRCUMSTANCES SURROUNDING NORTHWESTERN'S**
14 **PURCHASE OF BATTLE CREEK COMPARABLE TO FPL'S ACQUISITION**
15 **OF THE WOODFORD PROJECT?**

16 A No. Although NorthWestern is an integrated utility, like FPL, the circumstances
17 surrounding the Battle Creek purchase are clearly different from FPL's Woodford
18 acquisition. For example:

- 19 • NorthWestern sells *both* electricity and natural gas. Gas sales
20 account for about 25% of NorthWestern's revenues. Further, 20
21 billion cubic feet (BCF) out of NorthWestern's 25 BCF strategic
22 natural gas acquisitions serve that utility's natural gas customers.⁵
23 FPL sells only electricity.

⁵ FPL's Response to Staff's POD No. 5 (Bates No. 14-00330).

- 1 • NorthWestern does not own any significant natural gas
2 generation. In 2013, natural gas comprised only 15% of
3 NorthWestern's generation mix. It owns no combined cycle
4 natural gas plants as does FPL.
- 5 • The Battle Creek gas field was located in NorthWestern's service
6 territory. It had been in production since 1978. In fact,
7 NorthWestern purchased gas from the same field for its natural
8 gas customers. Woodford is located in Oklahoma and must be
9 transported approximately 480 miles to the SSHP and then an
10 additional 400 to 500 miles to FPL's service area.
- 11 • NorthWestern's purchase of a natural gas producing field was
12 made pursuant to a state statute, and it was subject to approval
13 from state regulators. It is unclear whether there is statutory
14 authority authorizing FPL's involvement in natural gas extraction.

15 **Q DOES THE APPROVAL OF NORTHWESTERN ENERGY'S BATTLE CREEK**
16 **ACQUISITION PROVIDE AMPLE PRECEDENT TO APPROVE FPL'S**
17 **PETITION?**

18 A No. Although the Montana Commission findings can provide some guidance in
19 this instance, the circumstances surrounding Battle Creek are clearly different
20 than for Woodford. For this reason, the Commission must require FPL to adhere
21 to a much higher burden of proof before the Woodford (or similar future gas
22 reserve projects) acquisition(s) can be considered to be in the public interest.

23 **Q SHOULD THE COMMISSION ADOPT FPL'S PROPOSED GUIDELINES AS**
24 **COMMISSION GUIDELINES?**

25 A No. First, as previously demonstrated, natural gas extraction is a risky business
26 that should not be financed by ratepayers without imposing comparable risks on
27 FPL's shareholders. Second, FPL's proposed guidelines would allow the
28 regulated utility to recover its costs with little to no risk, while placing market risk,
29 production risk, and operation risk on ratepayers. This is an unjustified and
30 unwarranted allocation of risk between the utility and its customers. Third, the
31 proposed guidelines are silent on several key policy issues. Fourth, the

1 Commission should not summarily accept FPL's proposal. It should hold
2 workshops to hear from other investor-owned utilities and interested parties
3 before considering or adopting a policy allowing electric utilities to engage in
4 similar upstream projects.

5 Finally, FPL's suggested guidelines have a loophole that could render the
6 other provisions of the guidelines meaningless. Specifically:

7 Flexibility to respond to market opportunities is in the best interest
8 of FPL and its customers. Therefore, it is understood that FPL
9 may ... seek Fuel Clause recovery for a project that deviates from
10 one or more of the guidelines upon a showing that the project
11 nonetheless is executed to benefit FPL customers.⁶

12 This provision would effectively allow FPL to not follow the guidelines should it
13 decide not to do so. In sum, FPL's proposed guidelines should not be adopted
14 as the Commission's guidelines because of the unnecessary and unwarranted
15 risk placed on customers. If the Commission decides to authorize Florida's
16 investor-owned to invest in upstream businesses, it should hold workshops and
17 promulgate rules addressing the topic.

18 **Q WHAT DO YOU RECOMMEND?**

19 A The Commission should not approve the Woodford acquisition without thoroughly
20 vetting the policy issues and the unanswered questions raised by FPL's Petition.
21 There is too much risk on FPL's customers for little or no return, while providing
22 ample (and virtually guaranteed) benefits to FPL. For these reasons, the Petition
23 should be denied.

⁶ Exhibit SF-9, page 4.

1 **General and Administrative Expenses**

2 **Q IS FPL PROPOSING TO RECOVER GENERAL AND ADMINISTRATIVE**
3 **EXPENSES THROUGH THE FUEL CLAUSE?**

4 A Yes. FPL's cost-benefit analysis projects \$300,000 per year in G&A associated
5 with the Project. These expenses would be included in the Fuel Clause.⁷

6 **Q IS THE RECOVERY OF GENERAL AND ADMINISTRATIVE EXPENSES**
7 **THROUGH THE FUEL CLAUSE APPROPRIATE?**

8 A No. G&A fees do not qualify for Fuel Clause recovery because, unlike the
9 commodity and transportation cost, they are relatively fixed and not volatile.
10 These expenses do not vary with the volume of natural gas from the Project.
11 Further, given that 65% of FPL's generation is from natural gas, it follows that
12 FPL possesses the necessary resources to procure and manage its natural gas
13 supply.⁸

14 **Q DOES THE COMMISSION HAVE A SPECIFIC POLICY OF THE TYPES OF**
15 **COSTS FOR WHICH FUEL CLAUSE RECOVERY IS APPROPRIATE?**

16 A Yes. The Commission's policy was adopted in Order No. 14546 issued in Docket
17 No. 850001-EI-B on July 8, 1985. Specifically, with respect to G&A, the
18 Commission stated:

19 Fuel Procurement Administrative Charges. Each of the utilities
20 have staffs responsible for fuel procurement, and the costs
21 associated with fuel procurement and administration do not bear a
22 significant relationship to the volume or price of fuel purchases.
23 These costs are relatively fixed and are not volatile; they are more
24 appropriately recovered through base rates.

⁷ Direct Testimony of Kim Ousdahl at 24 and Exhibit KO-6.

⁸ Direct Testimony of Sam Forrest at 10.

1 Accordingly, excluding G&A costs from the Fuel Clause is also consistent with
2 this Commission's policy.

3 **Q DOES THIS CONCLUDE YOUR TESTIMONY?**

4 **A Yes.**

APPENDIX A

Qualifications of Jeffrey Pollock

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

2 A Jeffrey Pollock. 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 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 Masters in
8 Business Administration from Washington University. I have also completed a
9 Utility Finance and Accounting course.

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

15 During my tenure at both DBA and BAI, I have been engaged in a wide
16 range of consulting assignments including energy and regulatory matters in both
17 the United States and several Canadian provinces. This includes preparing
18 financial and economic studies of investor-owned, cooperative and municipal
19 utilities on revenue requirements, cost of service and rate design, and conducting
20 site evaluation. Recent engagements have included advising clients on electric
21 restructuring issues, assisting clients to procure and manage electricity in both

1 competitive and regulated markets, developing and issuing requests for
2 proposals (RFPs), evaluating RFP responses and contract negotiation. I was
3 also responsible for developing and presenting seminars on electricity issues.

4 I have worked on various projects in over 20 states and several Canadian
5 provinces, and have testified before the Federal Energy Regulatory Commission
6 and the state regulatory commissions of Alabama, Arizona, Colorado, Delaware,
7 Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Louisiana, Minnesota,
8 Mississippi, Missouri, Montana, New Jersey, New Mexico, Ohio, Pennsylvania,
9 Texas, Virginia, Washington, and Wyoming. I have also appeared before the
10 City of Austin Electric Utility Commission, the Board of Public Utilities of Kansas
11 City, Kansas, the Bonneville Power Administration, Travis County (Texas) District
12 Court, and the U.S. Federal District Court. A partial list of my appearances is
13 provided in **Appendix B**.

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
18 energy consumers. J.Pollock is a registered Class I aggregator in the State of
19 Texas.

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffry Pollock

PROJECT	UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
140401	ROCKY MOUNTAIN POWER	Wyoming Industrial Energy Consumers	20000-446-ER14	Surrebuttal	WY	Class Cost-of-Service, Rule 12 (Line Extension Policy)	9/19/2014
140805	INDIANA MICHIGAN POWER COMPANY	I&M Industrial Group	44511	Direct	IN	Clean Energy Solar Pilot Project, Solar Power Rider and Green Power Rider	9/17/2014
140201	VARIOUS UTILITIES	Florida Industrial Power Users Group	140002-EI	Direct	FL	Energy Efficiency Cost Recovery Opt-Out Provision	9/5/2014
140401	ROCKY MOUNTAIN POWER	Wyoming Industrial Energy Consumers	20000-446-ER14	Cross	WY	Class Cost-of-Service Study; Rule 12 Line Extension	9/5/2014
131002	NORTHERN STATES POWER COMPANY	Xcel Large Industrials	E-002/GR-13-868	Surrebuttal	MN	Nuclear Depreciation Expense, Monticello EPU/LCM Project, Class Cost-of-Service Study, Class Revenue Allocation, Fuel Clause Rider Reform Rate Design	8/4/2014
140401	ROCKY MOUNTAIN POWER	Wyoming Industrial Energy Consumers	20000-446-ER14	Direct	WY	Class Cost-of-Service Study, Rule 12 Line Extension	7/25/2014
140601	DUKE ENERGY FLORIDA	NRG Florida, LP	140111 and 140110	Direct	FL	Cost-Effectiveness of Proposed Self Build Generating Projects	7/14/2014
131002	NORTHERN STATES POWER COMPANY	Xcel Large Industrials	E-002/GR-13-868	Rebuttal	MN	Class Cost-of-Service Study, Class Revenue Allocation	7/7/2014
140303	PPL ELECTRIC UTILITIES CORPORATION	PP&L Industrial Customer Alliance	2013-2398440	Rebuttal	PA	Energy Efficiency Cost Recovery	7/1/2014
131002	NORTHERN STATES POWER COMPANY	Xcel Large Industrials	E-002/GR-13-868	Direct	MN	Revenue Requirements, Fuel Clause Rider, Class Cost-of-Service Study, Rate Design and Revenue Allocation	6/5/2014
140303	PPL ELECTRIC UTILITIES CORPORATION	PP&L Industrial Customer Alliance	2013-2398440	Direct	PA	Energy Efficiency Cost Recovery	5/23/2014
140105	SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	42042	Direct	TX	Transmission Cost Recovery Factor	4/24/2014
130901	ENERGY TEXAS, NC.	Texas Industrial Energy Consumers	41791	Cross	TX	Class Cost-of-Service Study and Rate Design	1/31/2014
130901	ENERGY TEXAS, NC.	Texas Industrial Energy Consumers	41791	Direct	TX	Revenue Requirements, Fuel Reconciliation; Cost Allocation Issues, Rate Design Issues	1/10/2014
131005	DUQUESNE LIGHT COMPANY	Duquesne Industrial Intervenors	R-2013-2372129	Supplemental Surrebuttal	PA	Class Cost-of-Service Study	12/13/2013
131005	DUQUESNE LIGHT COMPANY	Duquesne Industrial Intervenors	R-2013-2372129	Surrebuttal	PA	Class Cost-of-Service Study; Cash Working Capital; Miscellaneous General Expense; Uncollectable Expense; Class Revenue Allocation	12/9/2013
131005	DUQUESNE LIGHT COMPANY	Duquesne Industrial Intervenors	R-2013-2372129	Rebuttal	PA	Rate L Transmission Service; Class Revenue Allocation	11/26/2013
130905	ENERGY TEXAS, INC. ITC HOLDINGS CORP.	Texas Industrial Energy Consumers	41850	Direct	TX	Rate Mitigation Plan; Conditions re Transfer of Control of Ownership	11/6/2013
130501	MIDAMERICAN ENERGY COMPANY	Deere & Company	RPU-2013-0004	Surrebuttal	IA	Class Cost-of-Service Study; Class Revenue Allocation; Depreciation Surplus	11/4/2013

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffrey Pollock

PROJECT	UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
130602	SHARYLAND UTILITIES	Texas Industrial Energy Consumers and Atlas Pipeline Mid-Continent WestTex, LLC	41474	Cross-Rebuttal	TX	Customer Class Definitions; Class Revenue Allocation; Allocation of TTC costs	11/4/2013
131005	DUQUESNE LIGHT COMPANY	Duquesne Industrial Intervenors	R-2013-2372129	Direct	PA	Class Cost-of-Service, Class Revenue Allocations	11/1/2013
130906	PUBLIC SERVICE ENERGY AND GAS	New Jersey Large Energy Users Coalition	EO13020155 and GO13020156	Direct	NJ	Energy Strong	10/28/2013
130602	SHARYLAND UTILITIES	Texas Industrial Energy Consumers and Atlas Pipeline Mid-Continent WestTex, LLC	41474	Direct	TX	Regulatory Asset Cost Recovery; Class Cost-of-Service Study, Class Revenue Allocation, Rate Design	10/18/2013
130903	GEORGIA POWER COMPANY	Georgia Industrial Group and Georgia Association of Manufacturers	36989	Direct	GA	Depreciation Expense, Alternate Rate Plan, Return on Equity, Class Cost-of-Service Study, Class Revenue Allocation, Rate Design	10/18/2013
130501	MIDAMERICAN ENERGY COMPANY	Deere & Company	RPU-2013-0004	Rebuttal	IA	Class Cost-of-Service Study	10/1/2013
130902	FLORIDA POWER AND LIGHT COMPANY	Florida Industrial Power Users Group	130007	Direct	FL	Environmental Cost Recovery Clause	9/13/2013
130501	MIDAMERICAN ENERGY COMPANY	Deere & Company	RPU-2013-0004	Direct	IA	Class Cost-of-Service Study, Class Revenue Allocation, Depreciation, Cost Recovery Clauses, Revenue Sharing, Revenue True-up	9/10/2013
130202	SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	12-00350-UT	Rebuttal	NM	RPS Cost Rider	9/9/2013
130701	WESTAR ENERGY INC. and KANSAS GAS & ELECTRIC CO.	Occidental Chemical Corporation	13-WSEE-629-RTS	Cross-Answering	KS	Cost Allocation Methodology	9/5/2013
130202	SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Permian Ltd.	12-00350-UT	Direct	NM	Class Cost-of-Service Study	8/22/2013
130701	WESTAR ENERGY INC. and KANSAS GAS & ELECTRIC CO.	Occidental Chemical Corporation	13-WSEE-629-RTS	Direct	KS	Class Revenue Allocation.	8/21/2013
130203	ENTERGY TEXAS, NC.	Texas Industrial Energy Consumers	41437	Direct	TX	Avoided Cost; Standby Rate Design	8/14/2013
100902	MID-KANSAS ELECTRIC COMPANY, LLC	Western Kansas Industrial Electric Consumers	13-MKEE-699	Direct	KS	Class Revenue Allocation	8/12/2013
100902	MID-KANSAS ELECTRIC COMPANY, LLC	Western Kansas Industrial Electric Consumers	13-MKEE-447	Supplemental	KS	Testimony in Support of Settlement	8/9/2013
100902	MID-KANSAS ELECTRIC COMPANY, LLC	Western Kansas Industrial Electric Consumers	13-MKEE-447	Supplemental	KS	Modification Agreement	7/24/2013
130201	TAMPA ELECTRIC COMPANY	Florida Industrial Power Users Group	130040	Direct	FL	GSD-IS Consolidation, GSD and IS Rate Design, Class Cost-of-Service Study, Planned Outage Expense, Storm Damage Expense	7/15/2013
100902	MID-KANSAS ELECTRIC COMPANY, LLC	Western Kansas Industrial Electric Consumers	13-MKEE-452	Supplemental	KS	Testimony in Support of Nonunanimous Settlement	6/28/2013
121203	JERSEY CENTRAL POWER & LIGHT COMPANY	Gerdau Ameristeel Sayreville, Inc.	ER12111052	Direct	NJ	Cost of Service Study for GT-230 KV Customers; AREP Rider	6/14/2013

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffry Pollock

PROJECT	UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
100902	MID-KANSAS ELECTRIC COMPANY, LLC	Western Kansas Industrial Electric Consumers	13-MKEE-447	Direct	KS	Wholesale Requirements Agreement; Process for Exemption From Regulation; Conditions Required for Public Interest Finding on CCN spin-down	5/14/2013
100902	MID-KANSAS ELECTRIC COMPANY, LLC	Western Kansas Industrial Electric Consumers	13-MKEE-452	Cross	KS	Formula Rate Plan for Distribution Utility	5/10/2013
100902	MID-KANSAS ELECTRIC COMPANY, LLC	Western Kansas Industrial Electric Consumers	13-MKEE-452	Direct	KS	Formula Rate Plan for Distribution Utility	5/3/2013
121001	ENERGY TEXAS, INC. ITC HOLD NGS CORP.	Texas Industrial Energy Consumers	41223	Direct	TX	Public Interest of Proposed Divestiture of ETI's Transmission Business to an ITC Holdings	4/30/2013
121101	NORTHERN STATES POWER COMPANY	Xcel Large Industrials	12-961	Surrebuttal	MN	Depreciation; Used and Useful; Cost Allocation; Revenue Allocation	4/12/2013
121101	NORTHERN STATES POWER COMPANY	Xcel Large Industrials	12-961	Rebuttal	MN	Class Revenue Allocation.	3/25/2013
121101	NORTHERN STATES POWER COMPANY	Xcel Large Industrials	12-961	Direct	MN	Depreciation; Used and Useful; Property Tax; Cost Allocation; Revenue Allocation; Competitive Rate & Property Tax Riders	2/28/2013
91203	ENERGY TEXAS, NC.	Texas Industrial Energy Consumers	38951	Second Supplemental Rebuttal	TX	Competitive Generation Service Tariff	2/1/2013
91203	ENERGY TEXAS, NC.	Texas Industrial Energy Consumers	38951	Second Supplemental Direct	TX	Competitive Generation Service Tariff	1/11/2013
110202	SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	40443	Cross Rebuttal	TX	Cost Allocation and Rate Design	1/10/2013
110202	SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	40443	Direct	TX	Application of the Turk Plant Cost-Cap; Revenue Requirements; Class Cost-of-Service Study; Class Revenue Allocation; Industrial Rate Design	12/10/2012
120301	FLORIDA POWER AND LIGHT COMPANY	Florida Industrial Power Users Group	120015	Corrected Supplemental Rebuttal	FL	Support for Non-Unanimous Settlement	11/13/2012
120301	FLORIDA POWER AND LIGHT COMPANY	Florida Industrial Power Users Group	120015	Corrected Supplemental Direct	FL	Support for Non-Unanimous Settlement	11/13/2012
120602	NIAGARA MOHAWK POWER CORP.	Multiple Intervenors	12-E-0201/12-G-0202	Rebuttal	NY	Electric and Gas Class Cost-of-Service Studies	9/25/2012
120602	NIAGARA MOHAWK POWER CORP.	Multiple Intervenors	12-E-0201/12-G-0202	Direct	NY	Electric and Gas Class Cost-of-Service Study; Revenue Allocation; Rate Design; Historic Demand	8/31/2012
100902	MID-KANSAS ELECTRIC COMPANY, LLC	Western Kansas Industrial Electric Consumers	12-MKEE-650-TAR	Direct	KS	Transmission Formula Rate Plan	7/31/2012
120502	WESTAR ENERGY INC. and KANSAS GAS & ELECTRIC CO.	Occidental Chemical Corporation	12-WSEE-651-TAR	Direct	KS	TDC Tariff	7/30/2012
120301	FLORIDA POWER AND LIGHT COMPANY	Florida Industrial Power Users Group	120015	Direct	FL	Class Cost-of-Service Study, Revenue Allocation and Rate Design	7/2/2012
120101	LONE STAR TRANSMISSION, LLC	Texas Industrial Energy Consumers	40020	Direct	TX	Revenue Requirement, Rider AVT	6/21/2012
111102	ENERGY TEXAS, NC.	Texas Industrial Energy Consumers	39896	Cross	TX	Class Cost-of-Service Study, Revenue Allocation and Rate Design	4/13/2012
111102	ENERGY TEXAS, NC.	Texas Industrial Energy Consumers	39896	Direct	TX	Revenue Requirements, Class Cost-of-Service Study, Revenue Allocation, and Rate Design	3/27/2012

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffry Pollock

PROJECT	UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
91023	ENERGY TEXAS, NC.	Texas Industrial Energy Consumers	38951	Supplemental Rebuttal	TX	Competitive Generation Service Issues	2/24/2012
91203	ENERGY TEXAS, NC.	Texas Industrial Energy Consumers	38951	Supplemental Direct	TX	Competitive Generation Service Issues	2/10/2012
101101	AEP TEXAS CENTRAL COMPANY	Texas Industrial Energy Consumers	39722	Direct	TX	Carrying Charge Rate Applicable to the Additional True-Up Balance and Tax Balances	11/4/2011
110703	GULF POWER COMPANY	Florida Industrial Power Users Group	110138-EI	Direct	FL	Cost Allocation and Storm Reserve	10/14/2011
90404	CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Texas Industrial Energy Consumers	39504	Direct	TX	Carrying Charge Rate Applicable to the Additional True-Up Balance and Taxes	9/12/2011
101101	AEP TEXAS NORTH COMPANY	Texas Industrial Energy Consumers	39361	Cross-Rebuttal	TX	Energy Efficiency Cost Recovery Factor	8/10/2011
101101	AEP TEXAS CENTRAL COMPANY	Texas Industrial Energy Consumers	39360	Cross-Rebuttal	TX	Energy Efficiency Cost Recovery Factor	8/10/2011
100503	ONCOR ELECTRIC DELIVERY COMPANY, LLC	Texas Industrial Energy Consumers	39375	Direct	TX	Energy Efficiency Cost Recovery Factor	8/2/2011
90103	ALABAMA POWER COMPANY	Alabama Industrial Energy Consumers	31653	Direct	AL	Renewable Purchased Power Agreement	7/28/2011
101101	AEP TEXAS NORTH COMPANY	Texas Industrial Energy Consumers	39361	Direct	TX	Energy Efficiency Cost Recovery Factor	7/26/2011
101101	AEP TEXAS CENTRAL COMPANY	Texas Industrial Energy Consumers	36360	Direct	TX	Energy Efficiency Cost Recovery Factor	7/20/2011
90201	ENERGY TEXAS, NC.	Texas Industrial Energy Consumers	39366	Direct	TX	Energy Efficiency Cost Recovery Factor	7/19/2011
90404	CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Texas Industrial Energy Consumers	39363	Direct	TX	Energy Efficiency Cost Recovery Factor	7/15/2011
101201	NORTHERN STATES POWER COMPANY	Xcel Large Industrials	E002/GR-10-971	Surrebuttal	MN	Depreciation; Non-Asset Margin Sharing; Step-In Increase; Class Cost-of-Service Study; Class Revenue Allocation; Rate Design	5/26/2011
101201	NORTHERN STATES POWER COMPANY	Xcel Large Industrials	E002/GR-10-971	Rebuttal	MN	Classification of Wind Investment	5/4/2011
101201	NORTHERN STATES POWER COMPANY	Xcel Large Industrials	E002/GR-10-971	Direct	MN	Surplus Depreciation Reserve, Incentive Compensation, Non-Asset Trading Margin Sharing, Cost Allocation, Class Revenue Allocation, Rate Design	4/5/2011
101202	ROCKY MOUNTAIN POWER	Wyoming Industrial Energy Consumers	20000-381-EA-10	Direct	WY	2010 Protocols	2/11/2011
100802	TEXAS-NEW MEXICO POWER COMPANY	Texas Industrial Energy Consumers	38480	Direct	TX	Cost Allocation, TCRF	11/8/2010
90402	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Traditional Manufacturers Group	31958	Direct	GA	Alternate Rate Plan, Return on Equity, Riders, Cost-of-Service Study, Revenue Allocation, Economic Development	10/22/2010
90404	CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Texas Industrial Energy Consumers	38339	Cross-Rebuttal	TX	Cost Allocation, Class Revenue Allocation	9/24/2010
90404	CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Texas Industrial Energy Consumers	38339	Direct	TX	Pension Expense, Surplus Depreciation Reserve, Cost Allocation, Rate Design, Riders	9/10/2010

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffrey Pollock

PROJECT	UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
100303	NIAGARA MOHAWK POWER CORP.	Multiple Intervenors	10-E-0050	Rebuttal	NY	Multi-Year Rate Plan, Cost Allocation, Revenue Allocation, Reconciliation Mechanisms, Rate Design	8/6/2010
100303	NIAGARA MOHAWK POWER CORP.	Multiple Intervenors	10-E-0050	Direct	NY	Multi-Year Rate Plan, Cost Allocation, Revenue Allocation, Reconciliation Mechanisms, Rate Design	07/14/2010
91203	ENTERGY TEXAS, NC.	Texas Industrial Energy Consumers	37744	Cross Rebuttal	TX	Cost Allocation, Revenue Allocation, CGS Rate Design, Interruptible Service	6/30/2010
91203	ENTERGY TEXAS, NC.	Texas Industrial Energy Consumers	37744	Direct	TX	Class Cost of Service Study, Revenue Allocation, Rate Design, Competitive Generation Services, Line Extension Policy	6/9/2010
90201	ENTERGY TEXAS, NC.	Texas Industrial Energy Consumers	37482	Cross Rebuttal	TX	Allocation of Purchased Power Capacity Costs	2/3/2010
90402	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Traditional Manufacturers Group	28945	Direct	GA	Fuel Cost Recovery	1/29/2010
90201	ENTERGY TEXAS, NC.	Texas Industrial Energy Consumers	37482	Direct	TX	Purchased Power Capacity Cost Factor	1/22/2010
90403	VIRG NIA ELECTRIC AND POWER COMPANY	MeadWestvaco Corporation	PUE-2009-00081	Direct	VA	Allocation of DSM Costs	1/13/2010
90201	ENTERGY TEXAS, NC.	Texas Industrial Energy Consumers	37580	Direct	TX	Fuel refund	12/4/2009
90403	VIRG NIA ELECTRIC AND POWER COMPANY	MeadWestvaco Corporation	PUE-2009-00019	Direct	VA	Standby rate design; dynamic pricing	11/9/2009
80601	SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	37135	Direct	TX	Transmission cost recovery factor	10/22/2009
80703	MID-KANSAS ELECTRIC COMPANY, LLC	Western Kansas Industrial Electric Consumers	09-MKEE-969-RTS	Direct	KS	Revenue requirements, TIER, rate design	10/19/2009
90601	VARIOUS UT LITIES	Florida Industrial Power Users Group	090002-EG	Direct	FL	Interruptible Credits	10/2/2009
80505	ONCOR ELECTRIC DELIVERY COMPANY	Texas Industrial Energy Consumers	36958	Cross Rebuttal	TX	2010 Energy efficiency cost recovery factor	8/18/2009
81001	PROGRESS ENERGY FLOR DA	Florida Industrial Power Users Group	90079	Direct	FL	Cost-of-service study, revenue allocation, rate design, depreciation expense, capital structure	8/10/2009
90404	CENTERPOINT	Texas Industrial Energy Consumers	36918	Cross Rebuttal	TX	Allocation of System Restoration Costs	7/17/2009
90301	FLORIDA POWER AND LIGHT COMPANY	Florida Industrial Power Users Group	080677	Direct	FL	Depreciation; class revenue allocation; rate design; cost allocation and capital structure	7/16/2009
90201	ENTERGY TEXAS, NC.	Texas Industrial Energy Consumers	36956	Direct	TX	Approval to revise energy efficiency cost recovery factor	7/16/2009
90601	VARIOUS UT LITIES	Florida Industrial Power Users Group	VARIOUS DOCKETS	Direct	FL	Conservation goals	7/6/2009
90201	ENTERGY TEXAS, NC.	Texas Industrial Energy Consumers	36931	Direct	TX	System restoration costs under Senate Bill 769	6/30/2009
90502	SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	36966	Direct	TX	Authority to revise fixed fuel factors	6/18/2009
80805	TEXAS-NEW MEXICO POWER COMPANY	Texas Industrial Energy Consumers	36025	Cross-Rebuttal	TX	Cost allocation, revenue allocation and rate design	6/10/2009
80805	TEXAS-NEW MEXICO POWER COMPANY	Texas Industrial Energy Consumers	36025	Direct	TX	Cost allocation, revenue allocation, rate design	5/27/2009
81201	NORTHERN STATES POWER COMPANY	Xcel Large Industrials	08-1065	Surrebuttal	MN	Cost allocation, revenue allocation, rate design	5/27/2009
90403	VIRG NIA ELECTRIC AND POWER COMPANY	MeadWestvaco Corporation	PUE-2009-00018	Direct	VA	Transmission cost allocation and rate design	5/20/2009

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffry Pollock

PROJECT	UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
90101	NORTHERN INDIANA PUBLIC SERVICE COMPANY	Beta Steel Corporation	43526	Direct	IN	Cost allocation and rate design	5/8/2009
81203	ENERGY SERVICES, INC	Texas Industrial Energy Consumers	ER008-1056	Rebuttal	FERC	Rough Production Cost Equalization payments	5/7/2009
81201	NORTHERN STATES POWER COMPANY	Xcel Large Industrials	08-1065	Rebuttal	MN	Class revenue allocation and the classification of renewable energy costs	5/5/2009
81201	NORTHERN STATES POWER COMPANY	Xcel Large Industrials	08-1065	Direct	MN	Cost-of-service study, class revenue allocation and rate design	4/7/2009
81203	ENERGY SERVICES, INC	Texas Industrial Energy Consumers	ER08-1056	Answer	FERC	Rough Production Cost Equalization payments	3/6/2009
80901	ROCKY MOUNTAIN POWER	Wyoming Industrial Energy Consumers	20000-333-ER-08	Direct	WY	Cost of service study; revenue allocation; inverted rates; revenue requirements	1/30/2009
81203	ENERGY SERVICES	Texas Industrial Energy Consumers	ER08-1056	Direct	FERC	Entergy's proposal seeking Commission approval to allocate Rough Production Cost Equalization payments	1/9/2009
80505	ONCOR ELECTRIC DELIVERY COMPANY & TEXAS ENERGY FUTURE HOLDINGS LTD	Texas Industrial Energy Consumers	35717	Cross Rebuttal	TX	Retail transformation; cost allocation, demand ratchet waivers, transmission cost allocation factor	12/24/2008
70101	GEORGIA POWER COMPANY	Georgia Industrial Group and Georgia Traditional Manufacturers Association	27800	Direct	GA	Cash Return on CWP associated with the Plant Vogtle Expansion	12/19/2008
80505	ONCOR ELECTRIC DELIVERY COMPANY & TEXAS ENERGY FUTURE HOLDINGS LTD	Texas Industrial Energy Consumers	35717	Direct	TX	Revenue Requirement, class cost of service study, class revenue allocation and rate design	11/26/2008
80802	TAMPA ELECTRIC COMPANY	The Florida Industrial Power Users Group and Mosaic Company	080317-EI	Direct	FL	Revenue Requirements, retail class cost of service study, class revenue allocation, firm and non firm rate design and the Transmission Base Rate Adjustment	11/26/2008
80601	SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	35763	Supplemental Direct	TX	Recovery of Energy Efficiency Costs	11/6/2008
80601	SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	35763	Cross-Rebuttal	TX	Cost Allocation, Demand Ratchet, Renewable Energy Certificates (REC)	10/28/2008
80601	SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	35763	Direct	TX	Revenue Requirements, Fuel Reconciliation Revenue Allocation, Cost-of-Service and Rate Design Issues	10/13/2008
50106	ALABAMA POWER COMPANY	Alabama Industrial Energy Consumers	18148	Direct	AL	Energy Cost Recovery Rate (WITHDRAWN)	9/16/2008
50701	ENERGY TEXAS, NC.	Texas Industrial Energy Consumers	35269	Direct	TX	Allocation of rough production costs equalization payments	7/9/2008
70703	ENERGY GULF STATES UTILITIES, TEXAS	Texas Industrial Energy Consumers	34800	Direct	TX	Non-Unanimous Stipulation	6/11/2008
50103	TEXAS PUC STAFF	Texas Industrial Energy Consumers	33672	Supplemental Rebuttal	TX	Transmission Optimization and Ancillary Services Studies	6/3/2008
50103	TEXAS PUC STAFF	Texas Industrial Energy Consumers	33672	Supplemental Direct	TX	Transmission Optimization and Ancillary Services Studies	5/23/2008
60104	SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	33891	Supplemental Direct	TX	Certificate of Convenience and Necessity	5/8/2008
70703	ENERGY GULF STATES UTILITIES, TEXAS	Texas Industrial Energy Consumers	34800	Cross-Rebuttal	TX	Cost Allocation and Rate Design and Competitive Generation Service	4/18/2008
70703	ENERGY GULF STATES UTILITIES, TEXAS	Texas Industrial Energy Consumers	34800	Direct	TX	Eligible Fuel Expense	4/11/2008
70703	ENERGY GULF STATES UTILITIES, TEXAS	Texas Industrial Energy Consumers	34800	Direct	TX	Competitive Generation Service Tariff	4/11/2008

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffry Pollock

PROJECT	UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
70703	ENERGY GULF STATES UTILITIES, TEXAS	Texas Industrial Energy Consumers	34800	Direct	TX	Revenue Requirements	4/11/2008
70703	ENERGY GULF STATES UTILITIES, TEXAS	Texas Industrial Energy Consumers	34800	Direct	TX	Cost of Service study, revenue allocation, design of firm, interruptible and standby service tariffs; interconnection costs	4/11/2008
41229	TEXAS-NEW MEXICO POWER COMPANY	Texas Industrial Energy Consumers	35038	Rebuttal	TX	Over \$5 Billion Compliance Filing	4/14/2008
60303	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Traditional Manufacturers Group	26794	Direct	GA	Fuel Cost Recovery	4/15/2008
71202	SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Periman Ltd.	07-00319-UT	Rebuttal	NM	Revenue requirements, cost of service study, rate design	3/28/2008
61101	AEP TEXAS CENTRAL COMPANY	Texas Industrial Energy Consumers	35105	Direct	TX	Over \$5 Billion Compliance Filing	3/20/2008
51101	CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Texas Industrial Energy Consumers	32902	Direct	TX	Over \$5 Billion Compliance Filing	3/20/2008
71202	SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Periman Ltd.	07-00319-UT	Direct	NM	Revenue requirements, cost of service study (COS), rate design	3/7/2008
50701	ENERGY GULF STATES UTILITIES TEXAS	Texas Industrial Energy Consumers	34724	Direct	TX	IPCR Rider increase and interim surcharge	11/28/2007
70601	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Traditional Manufacturers Group	25060-U	Direct	GA	Return on equity; cost of service study; revenue allocation; LR Rider; spinning reserve tariff; RTP	10/24/2007
70303	ONCOR ELECTRIC DELIVERY COMPANY & TEXAS ENERGY FUTURE HOLDINGS LTD	Texas Industrial Energy Consumers	34077	Direct	TX	Acquisition; public interest	9/14/2007
60104	SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	33891	Direct	TX	Certificate of Convenience and Necessity	8/30/2007
61201	ALTAMAHA ELECTRIC MEMBERSHIP CORPORATION	SP Newsprint Company	25226-U	Rebuttal	GA	Discriminatory Pricing; Service Territorial Transfer	7/17/2007
61201	ALTAMAHA ELECTRIC MEMBERSHIP CORPORATION	SP Newsprint Company	25226-U	Direct	GA	Discriminatory Pricing; Service Territorial Transfer	7/6/2007
70502	PROGRESS ENERGY FLORIDA	Florida Industrial Power Users Group	070052-EI	Direct	FL	Nuclear update cost recovery	6/19/2007
70603	ELECTRIC TRANSMISSION TEXAS LLC	Texas Industrial Energy Consumers	33734	Direct	TX	Certificate of Convenience and Necessity	6/8/2007
60601	TEXAS PUC STAFF	Texas Industrial Energy Consumers	32795	Rebuttal Remand	TX	Interest rate on stranded cost reconciliation	6/15/2007
60601	TEXAS PUC STAFF	Texas Industrial Energy Consumers	32795	Remand	TX	Interest rate on stranded cost reconciliation	6/8/2007
50103	TEXAS PUC STAFF	Texas Industrial Energy Consumers	33672	Rebuttal	TX	CREZ Nominations	5/21/2007
50701	ENERGY GULF STATES UTILITIES, TEXAS	Texas Industrial Energy Consumers	33687	Direct	TX	Transition to Competition	4/27/2007
50103	TEXAS PUC STAFF	Texas Industrial Energy Consumers	33672	Direct	TX	CREZ Nominations	4/24/2007
61101	AEP TEXAS CENTRAL COMPANY	Texas Industrial Energy Consumers	33309	Cross-Rebuttal	TX	Cost Allocation, Rate Design, Riders	4/3/2007
50701	ENERGY GULF STATES UTILITIES TEXAS	Texas Industrial Energy Consumers	32710	Cross-Rebuttal	TX	Fuel and Rider PCR Reconciliation	3/16/2007
61101	AEP TEXAS NORTH COMPANY	Texas Industrial Energy Consumers	33310	Direct	TX	Cost Allocation, Rate Design, Riders	3/13/2007
61101	AEP TEXAS CENTRAL COMPANY	Texas Industrial Energy Consumers	33309	Direct	TX	Cost Allocation, Rate Design, Riders	3/13/2007
50701	ENERGY GULF STATES UTILITIES TEXAS	Texas Industrial Energy Consumers	32710	Direct	TX	Fuel and Rider PCR Reconciliation	2/28/2007
41219	AEP TEXAS NORTH COMPANY	Texas Industrial Energy Consumers	31461	Direct	TX	Rider CTC design	2/15/2007
50701	ENERGY GULF STATES UTILITIES TEXAS	Texas Industrial Energy Consumers	33586	Cross-Rebuttal	TX	Hurricane Rita reconstruction costs	1/30/2007
60104	SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	32898	Direct	TX	Fuel Reconciliation	1/29/2007
50701	ENERGY GULF STATES UTILITIES TEXAS	Texas Industrial Energy Consumers	33586	Direct	TX	Hurricane Rita reconstruction costs	1/18/2007

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffry Pollock

PROJECT	UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
60303	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Textile Manufacturers Group	23540-U	Direct	GA	Fuel Cost Recovery	1/11/2007
60503	SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	32766	Cross Rebuttal	TX	Cost allocation, Cost of service, Rate design	1/8/2007
60503	SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	32766	Direct	TX	Cost allocation, Cost of service, Rate design	12/22/2006
60503	SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	32766	Direct	TX	Revenue Requirements,	12/15/2006
60503	SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	32766	Direct	TX	Fuel Reconciliation	12/15/2006
50701	ENERGY GULF STATES UTILITIES TEXAS	Texas Industrial Energy Consumers	32907	Cross Rebuttal	TX	Hurricane Rita reconstruction costs	10/12/06
50701	ENERGY GULF STATES UTILITIES TEXAS	Texas Industrial Energy Consumers	32907	Direct	TX	Hurricane Rita reconstruction costs	10/09/06
60601	TEXAS PUC STAFF	Texas Industrial Energy Consumers	32795	Cross Rebuttal	TX	Stranded Cost Reallocation	09/07/06
60101	COLQUITT EMC	ERCO Worldwide	23549-U	Direct	GA	Service Territory Transfer	08/10/06
60601	TEXAS PUC STAFF	Texas Industrial Energy Consumers	32795	Direct	TX	Stranded Cost Reallocation	08/23/06
60104	SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	32672	Direct	TX	ME-SPP Transfer of Certificate to SWEPCO	8/23/2006
50503	AEP TEXAS CENTRAL COMPANY	Texas Industrial Energy Consumers	32758	Direct	TX	Rider CTC design and cost recovery	08/24/06
60503	SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	32685	Direct	TX	Fuel Surcharge	07/26/06
60301	PUBLIC SERVICE ELECTRIC AND GAS COMPANY	New Jersey Large Energy Consumers	171406	Direct	NJ	Gas Delivery Cost allocation and Rate design	06/21/06
60303	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Textile Manufacturers Group	22403-U	Direct	GA	Fuel Cost Recovery Allowance	05/05/06
50503	AEP TEXAS CENTRAL COMPANY	Texas Industrial Energy Consumers	32475	Cross-Rebuttal	TX	ADFIT Benefit	04/27/06
50503	AEP TEXAS CENTRAL COMPANY	Texas Industrial Energy Consumers	32475	Direct	TX	ADFIT Benefit	04/17/06
41229	TEXAS-NEW MEXICO POWER COMPANY	Texas Industrial Energy Consumers	31994	Cross-Rebuttal	TX	Stranded Costs and Other True-Up Balances	3/16/2006
41229	TEXAS-NEW MEXICO POWER COMPANY	Texas Industrial Energy Consumers	31994	Direct	TX	Stranded Costs and Other True-Up Balances	3/10/2006
50303	SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Periman Ltd. Occidental Power Marketing	ER05-168-001	Direct	NM	Fuel Reconciliation	3/6/2006
50701	ENERGY GULF STATES UTILITIES TEXAS	Texas Industrial Energy Consumers	31544	Cross-Rebuttal	TX	Transition to Competition Costs	01/13/06
50701	ENERGY GULF STATES UTILITIES TEXAS	Texas Industrial Energy Consumers	31544	Direct	TX	Transition to Competition Costs	01/13/06
50601	PUBLIC SERVICE ELECTRIC AND GAS COMPANY AND EXELON CORPORATION	New Jersey Large Energy Consumers Retail Energy Supply Association	BPU EM05020106 OAL PUC-1874-05	Surrebuttal	NJ	Merger	12/22/2005
50705	SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Periman Ltd. Occidental Power Marketing	EL05-19-002; ER05-168-001	Responsive	FERC	Fuel Cost adjustment clause (FCAC)	11/18/2005
50601	PUBLIC SERVICE ELECTRIC AND GAS COMPANY AND EXELON CORPORATION	New Jersey Large Energy Consumers Retail Energy Supply Association	BPU EM05020106 OAL PUC-1874-05	Direct	NJ	Merger	11/14/2005
50102	PUBLIC UTILITY COMMISSION OF TEXAS	Texas Industrial Energy Consumers	31540	Direct	TX	Nodal Market Protocols	11/10/2005
50701	ENERGY GULF STATES UTILITIES TEXAS	Texas Industrial Energy Consumers	31315	Cross-Rebuttal	TX	Recovery of Purchased Power Capacity Costs	10/4/2005
50701	ENERGY GULF STATES UTILITIES TEXAS	Texas Industrial Energy Consumers	31315	Direct	TX	Recovery of Purchased Power Capacity Costs	9/22/2005
50705	SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Periman Ltd. Occidental Power Marketing	EL05-19-002; ER05-168-001	Responsive	FERC	Fuel Cost Adjustment Clause (FCAC)	9/19/2005
50503	AEP TEXAS CENTRAL COMPANY	Texas Industrial Energy Consumers	31056	Direct	TX	Stranded Costs and Other True-Up Balances	9/2/2005
50705	SOUTHWESTERN PUBLIC SERVICE COMPANY	Occidental Periman Ltd. Occidental Power Marketing	EL05-19-00; ER05-168-00	Direct	FERC	Fuel Cost adjustment clause (FCAC)	8/19/2006

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffry Pollock

PROJECT	UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
50203	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Textile Manufacturers Group	19142-U	Direct	GA	Fuel Cost Recovery	4/8/2005
41230	CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Texas Industrial Energy Consumers	30706	Direct	TX	Competition Transition Charge	3/16/2005
41230	CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Texas Industrial Energy Consumers	30485	Supplemental Direct	TX	Financing Order	1/14/2005
41230	CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC	Texas Industrial Energy Consumers	30485	Direct	TX	Financing Order	1/7/2005
8201	PUBLIC SERVICE COMPANY OF COLORADO	Colorado Energy Consumers	04S-164E	Cross Answer	CO	Cost of Service Study, Interruptible Rate Design	12/13/2004
8201	PUBLIC SERVICE COMPANY OF COLORADO	Colorado Energy Consumers	04S-164E	Answer	CO	Cost of Service Study, Interruptible Rate Design	10/12/2004
8244	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Textile Manufacturers Group	18300-U	Direct	GA	Revenue Requirements, Revenue Allocation, Cost of Service, Rate Design Economic Development	10/8/2004
8195	CENTERPOINT, RELIANT AND TEXAS GENCO	Texas Industrial Energy Consumers	29526	Direct	TX	True-Up	6/1/2004
8156	GEORGIA POWER COMPANY/SAVANNAH ELECTRIC AND POWER COMPANY	Georgia Industrial Group	17687-U/17688-U	Direct	GA	Demand Side Management	5/14/2004
8148	TEXAS-NEW MEXICO POWER COMPANY	Texas Industrial Energy Consumers	29206	Direct	TX	True-Up	3/29/2004
8095	CONECTIV POWER DELIVERY	New Jersey Large Energy Consumers	ER03020110	Surrebuttal	NJ	Cost of Service	3/18/2004
8111	AEP TEXAS CENTRAL COMPANY	Texas Industrial Energy Consumers	28840	Rebuttal	TX	Cost Allocation and Rate Design	2/4/2004
8095	CONECTIV POWER DELIVERY	New Jersey Large Energy Consumers	ER03020110	Direct	NJ	Cost Allocation and Rate Design	1/4/2004
7850	RELIANT ENERGY HL&P	Texas Industrial Energy Consumers	26195	Supplemental Direct	TX	Fuel Reconciliation	9/23/2003
8045	VIRGINIA ELECTRIC AND POWER COMPANY	Virginia Committee for Fair Utility Rates	PUE-2003-00285	Direct	VA	Stranded Cost	9/5/2003
8022	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Textile Manufacturers Group	17066-U	Direct	GA	Fuel Cost Recovery	7/22/2003
8002	AEP TEXAS CENTRAL COMPANY	Flint Hills Resources, LP	25395	Direct	TX	Delivery Service Tariff Issues	5/9/2003
7857	PUBLIC SERVICE ELECTRIC AND GAS COMPANY	New Jersey Large Energy Consumers	ER02050303	Supplemental	NJ	Cost of Service	3/14/2003
7850	RELIANT ENERGY HL&P	Texas Industrial Energy Consumers	26195	Direct	TX	Fuel Reconciliation	12/31/2002
7857	PUBLIC SERVICE ELECTRIC AND GAS COMPANY	New Jersey Large Energy Consumers	ER02050303	Surrebuttal	NJ	Revenue Allocation	12/16/2002
7836	PUBLIC SERVICE COMPANY OF COLORADO	Colorado Energy Consumers	02S-315EG	Answer	CO	Incentive Cost Adjustment	11/22/2002
7857	PUBLIC SERVICE ELECTRIC AND GAS COMPANY	New Jersey Large Energy Consumers	ER02050303	Direct	NJ	Revenue Allocation	10/22/2002
7863	DOMINION VIRGINIA POWER	Virginia Committee for Fair Utility Rates	PUE-2001-00306	Direct	VA	Generation Market Prices	8/12/2002
7718	FLORIDA POWER CORPORATION	Florida Industrial Power Users Group	000824-EI	Direct	FL	Rate Design	1/18/2002
7633	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Textile Manufacturers Group	14000-U	Direct	GA	Cost of Service Study, Revenue Allocation, Rate Design	10/12/2001
7555	TAMPA ELECTRIC COMPANY	Florida Industrial Power Users Group	010001-EI	Direct	FL	Rate Design	10/12/2001
7658	SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	24468	Direct	TX	Delay of Retail Competition	9/24/2001
7647	ENTERGY GULF STATES, NC.	Texas Industrial Energy Consumers	24469	Direct	TX	Delay of Retail Competition	9/22/2001
7608	RELIANT ENERGY HL&P	Texas Industrial Energy Consumers	23950	Direct	TX	Price to Beat	7/3/2001
7593	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Textile Manufacturers Group	13711-U	Direct	GA	Fuel Cost Recovery	5/11/2001
7520	GEORGIA POWER COMPANY SAVANNAH ELECTRIC & POWER COMPANY	Georgia Industrial Group/Georgia Textile Manufacturers Group	12499-U,13305-U,13306-U	Direct	GA	Integrated Resource Planning	5/11/2001
7303	ENTERGY GULF STATES, NC.	Texas Industrial Energy Consumers	22356	Rebuttal	TX	Allocation/Collection of Municipal Franchise Fees	3/31/2001

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffry Pollock

PROJECT	UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
7309	SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	22351	Cross-Rebuttal	TX	Energy Efficiency Costs	2/22/2001
7305	CPL, SWEPCO, and WTU	Texas Industrial Energy Consumers	22352, 22353, 22354	Cross-Rebuttal	TX	Allocation/Collection of Municipal Franchise Fees	2/20/2001
7423	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Textile Manufacturers Group	13140-U	Direct	GA	Interruptible Rate Design	2/16/2001
7305	CPL, SWEPCO, and WTU	Texas Industrial Energy Consumers	22352, 22353, 22354	Supplemental Direct	TX	Transmission Cost Recovery Factor	2/13/2001
7310	TEXAS-NEW MEXICO POWER COMPANY	Texas Industrial Energy Consumers	22349	Cross-Rebuttal	TX	Rate Design	2/12/2001
7308	TXU ELECTRIC COMPANY	Texas Industrial Energy Consumers	22350	Cross-Rebuttal	TX	Unbundled Cost of Service	2/12/2001
7303	ENTERGY GULF STATES, NC.	Texas Industrial Energy Consumers	22356	Cross-Rebuttal	TX	Stranded Cost Allocation	2/6/2001
7308	TXU ELECTRIC COMPANY	Texas Industrial Energy Consumers	22350	Direct	TX	Rate Design	2/5/2001
7303	ENTERGY GULF STATES, NC.	Texas Industrial Energy Consumers	22356	Supplemental Direct	TX	Rate Design	1/25/2001
7307	RELIANT ENERGY HL&P	Texas Industrial Energy Consumers	22355	Cross-Rebuttal	TX	Stranded Cost Allocation	1/12/2001
7303	ENTERGY GULF STATES, NC.	Texas Industrial Energy Consumers	22356	Direct	TX	Stranded Cost Allocation	1/9/2001
7307	RELIANT ENERGY HL&P	Texas Industrial Energy Consumers	22355	Direct	TX	Cost Allocation	12/13/2000
7375	CENTRAL POWER AND LIGHT COMPANY	Texas Industrial Energy Consumers	22352	Cross-Rebuttal	TX	CTC Rate Design	12/1/2000
7375	CENTRAL POWER AND LIGHT COMPANY	Texas Industrial Energy Consumers	22352	Direct	TX	Cost Allocation	11/1/2000
7308	TXU ELECTRIC COMPANY	Texas Industrial Energy Consumers	22350	Direct	TX	Cost Allocation	11/1/2000
7308	TXU ELECTRIC COMPANY	Texas Industrial Energy Consumers	22350	Cross-Rebuttal	TX	Cost Allocation	11/1/2000
7305	CPL, SWEPCO, and WTU	Texas Industrial Energy Consumers	22352, 22353, 22354	Direct	TX	Excess Cost Over Market	11/1/2000
7315	VARIOUS UTILITIES	Texas Industrial Energy Consumers	22344	Direct	TX	Generic Customer Classes	10/14/2000
7308	TXU ELECTRIC COMPANY	Texas Industrial Energy Consumers	22350	Direct	TX	Excess Cost Over Market	10/10/2000
7315	VARIOUS UTILITIES	Texas Industrial Energy Consumers	22344	Rebuttal	TX	Excess Cost Over Market	10/1/2000
7310	TEXAS-NEW MEXICO POWER COMPANY	Texas Industrial Energy Consumers	22349	Cross-Rebuttal	TX	Generic Customer Classes	10/1/2000
7310	TEXAS-NEW MEXICO POWER COMPANY	Texas Industrial Energy Consumers	22349	Direct	TX	Excess Cost Over Market	9/27/2000
7307	RELIANT ENERGY HL&P	Texas Industrial Energy Consumers	22355	Cross-Rebuttal	TX	Excess Cost Over Market	9/26/2000
7307	RELIANT ENERGY HL&P	Texas Industrial Energy Consumers	22355	Direct	TX	Excess Cost Over Market	9/19/2000
7334	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Textile Manufacturers Group	11708-U	Rebuttal	GA	RTP Petition	3/24/2000
7334	GEORGIA POWER COMPANY	Georgia Industrial Group/Georgia Textile Manufacturers Group	11708-U	Direct	GA	RTP Petition	3/1/2000
7232	PUBLIC SERVICE COMPANY OF COLORADO	Colorado Industrial Energy Consumers	99A-377EG	Answer	CO	Merger	12/1/1999
7258	TXU ELECTRIC COMPANY	Texas Industrial Energy Consumers	21527	Direct	TX	Securitization	11/24/1999
7246	CENTRAL POWER AND LIGHT COMPANY	Texas Industrial Energy Consumers	21528	Direct	TX	Securitization	11/24/1999
7089	VIRGINIA ELECTRIC AND POWER COMPANY	Virginia Committee for Fair Utility Rates	PUE980813	Direct	VA	Unbundled Rates	7/1/1999
7090	AMERICAN ELECTRIC POWER SERVICE CORPORATION	Old Dominion Committee for Fair Utility Rates	PUE980814	Direct	VA	Unbundled Rates	5/21/1999
7142	SHARYLAND UTILITIES, L.P.	Sharyland Utilities	20292	Rebuttal	TX	Certificate of Convenience and Necessity	4/30/1999
7060	PUBLIC SERVICE COMPANY OF COLORADO	Colorado Industrial Energy Consumers	98A-511E	Direct	CO	Allocation of Pollution Control Costs	3/1/1999
7039	SAVANNAH ELECTRIC AND POWER COMPANY	Various Industrial Customers	10205-U	Direct	GA	Fuel Costs	1/1/1999
6945	TAMPA ELECTRIC COMPANY	Florida Industrial Power Users Group	950379-EI	Direct	FL	Revenue Requirement	10/1/1998

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffrey Pollock

PROJECT	UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
6873	GEORGIA POWER COMPANY	Georgia Industrial Group	9355-U	Direct	GA	Revenue Requirement	10/1/1998
6729	VIRGINIA ELECTRIC AND POWER COMPANY	Virginia Committee for Fair Utility Rates	PUE960036 PUE96029	Direct	VA	Alternative Regulatory Plan	8/1/1998
6713	CENTRAL POWER AND LIGHT COMPANY	Texas Industrial Energy Consumers	16995	Cross-Rebuttal	TX	IRR	1/1/1998
6582	HOUSTON LIGHT NG & POWER COMPANY	Lyondell Petrochemical Company	96-02867	Direct	COURT	Interruptible Power	1997
6758	SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	17460	Direct	TX	Fuel Reconciliation	12/1/1997
6729	VIRGINIA ELECTRIC AND POWER COMPANY	Virginia Committee for Fair Utility Rates	PUE960036 PUE96029	Direct	VA	Alternative Regulatory Plan	12/1/1997
6713	CENTRAL POWER AND LIGHT COMPANY	Texas Industrial Energy Consumers	16995	Direct	TX	Rate Design	12/1/1997
6646	ENTERGY TEXAS	Texas Industrial Energy Consumers	16705	Rebuttal	TX	Competitive Issues	10/1/1997
6646	ENTERGY TEXAS	Texas Industrial Energy Consumers	16705	Rebuttal	TX	Competition	10/1/1997
6646	ENTERGY TEXAS	Texas Industrial Energy Consumers	473-96-2285/16705	Direct	TX	Rate Design	9/1/1997
6646	ENTERGY TEXAS	Texas Industrial Energy Consumers	16705	Direct	TX	Wholesale Sales	8/1/1997
6744	TAMPA ELECTRIC COMPANY	Florida Industrial Power Users Group	970171-EU	Direct	FL	Interruptible Rate Design	5/1/1997
6632	MISSISSIPPI POWER COMPANY	Colonial Pipeline Company	96-UN-390	Direct	MS	Interruptible Rates	2/1/1997
6558	TEXAS-NEW MEXICO POWER COMPANY	Texas Industrial Energy Consumers	15560	Direct	TX	Competition	11/11/1996
6508	TEXAS UTILITIES ELECTRIC COMPANY	Texas Industrial Energy Consumers	15195	Direct	TX	Treatment of margins	9/1/1996
6475	TEXAS UTILITIES ELECTRIC COMPANY	Texas Industrial Energy Consumers	15015	DIRECT	TX	Real Time Pricing Rates	8/8/1996
6449	CENTRAL POWER AND LIGHT COMPANY	Texas Industrial Energy Consumers	14965	Direct	TX	Quantification	7/1/1996
6449	CENTRAL POWER AND LIGHT COMPANY	Texas Industrial Energy Consumers	14965	Direct	TX	Interruptible Rates	5/1/1996
6449	CENTRAL POWER AND LIGHT COMPANY	Texas Industrial Energy Consumers	14965	Rebuttal	TX	Interruptible Rates	5/1/1996
6523	PUBLIC SERVICE COMPANY OF COLORADO	Multiple Intervenors	95A-531EG	Answer	CO	Merger	4/1/1996
6235	TEXAS UTILITIES ELECTRIC COMPANY	Texas Industrial Energy Consumers	13575	Direct	TX	Competitive Issues	4/1/1996
6435	SOUTHWESTERN PUBLIC SERVICE COMMISSION	Texas Industrial Energy Consumers	14499	Direct	TX	Acquisition	11/1/1995
6391	HOUSTON LIGHT NG & POWER COMPANY	Grace, W R. & Company	13988	Rebuttal	TX	Rate Design	8/1/1995
6353	SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	14174	Direct	TX	Costing of Off-System Sales	8/1/1995
6157	WEST TEXAS UTILITIES COMPANY	Texas Industrial Energy Consumers	13369	Rebuttal	TX	Cancellation Term	8/1/1995
6391	HOUSTON LIGHT NG & POWER COMPANY	Grace, W R. & Company	13988	Direct	TX	Rate Design	7/1/1995
6157	WEST TEXAS UTILITIES COMPANY	Texas Industrial Energy Consumers	13369	Direct	TX	Cancellation Term	7/1/1995
6296	GEORGIA POWER COMPANY	Georgia Industrial Group	5601-U	Rebuttal	GA	EPACT Rate-Making Standards	5/1/1995
6296	GEORGIA POWER COMPANY	Georgia Industrial Group	5601-U	Direct	GA	EPACT Rate-Making Standards	5/1/1995
6278	COMMONWEALTH OF VIRGINIA	VCFUR/ODCFUR	PUE940067	Rebuttal	VA	Integrated Resource Planning	5/1/1995
6295	GEORGIA POWER COMPANY	Georgia Industrial Group	5600-U	Supplemental	GA	Cost of Service	4/1/1995
6063	PUBLIC SERVICE COMPANY OF COLORADO	Multiple Intervenors	94I-430EG	Rebuttal	CO	Cost of Service	4/1/1995
6063	PUBLIC SERVICE COMPANY OF COLORADO	Multiple Intervenors	94I-430EG	Reply	CO	DSM Rider	4/1/1995
6295	GEORGIA POWER COMPANY	Georgia Industrial Group	5600-U	Direct	GA	Interruptible Rate Design	3/1/1995
6278	COMMONWEALTH OF VIRGINIA	VCFUR/ODCFUR	PUE940067	Direct	VA	EPACT Rate-Making Standards	3/1/1995
6125	SOUTHWESTERN PUBLIC SERVICE COMPANY	Texas Industrial Energy Consumers	13456	Direct	TX	DSM Rider	3/1/1995
6235	TEXAS UTILITIES ELECTRIC COMPANY	Texas Industrial Energy Consumers	13575 13749	Direct	TX	Cost of Service	2/1/1995
6063	PUBLIC SERVICE COMPANY OF COLORADO	Multiple Intervenors	94I-430EG	Answering	CO	Competition	2/1/1995

APPENDIX B
Testimony Filed in Regulatory Proceedings
by Jeffry Pollock

PROJECT	UTILITY	ON BEHALF OF	DOCKET	TYPE	REGULATORY JURISDICTION	SUBJECT	DATE
6061	HOUSTON LIGHT NG & POWER COMPANY	Texas Industrial Energy Consumers	12065	Direct	TX	Rate Design	1/1/1995
6181	GULF STATES UTILIT ES COMPANY	Texas Industrial Energy Consumers	12852	Direct	TX	Competitive Alignment Proposal	11/1/1994
6061	HOUSTON LIGHT NG & POWER COMPANY	Texas Industrial Energy Consumers	12065	Direct	TX	Rate Design	11/1/1994
5929	CENTRAL POWER AND LIGHT COMPANY	Texas Industrial Energy Consumers	12820	Direct	TX	Rate Design	10/1/1994
6107	SOUTHWESTERN ELECTRIC POWER COMPANY	Texas Industrial Energy Consumers	12855	Direct	TX	Fuel Reconciliation	8/1/1994
6112	HOUSTON LIGHT NG & POWER COMPANY	Texas Industrial Energy Consumers	12957	Direct	TX	Standby Rates	7/1/1994
5698	GULF POWER COMPANY	Misc. Group	931044-EI	Direct	FL	Standby Rates	7/1/1994
5698	GULF POWER COMPANY	Misc. Group	931044-EI	Rebuttal	FL	Competition	7/1/1994
6043	EL PASO ELECTRIC COMPANY	Phelps Dodge Corporation	12700	Direct	TX	Revenue Requirement	6/1/1994
6082	GEORGIA PUBLIC SERVICE COMMISSION	Georgia Industrial Group	4822-U	Direct	GA	Avoided Costs	5/1/1994
6075	GEORGIA POWER COMPANY	Georgia Industrial Group	4895-U	Direct	GA	FPC Certification Filing	4/1/1994
6025	MISSISS PPI POWER & LIGHT COMPANY	M EG	93-UA-0301	Comments	MS	Environmental Cost Recovery Clause	1/21/1994
5971	FLORIDA POWER & LIGHT COMPANY	Florida Industrial Power Users Group	940042-EI	Direct	FL	Section 712 Standards of 1992 EPACT	1/1/1994

FLORIDA POWER AND LIGHT COMPANY
Base Production Cost/Benefit Analysis
with Escalated Production and Transportation Costs
(\$ in Millions)

Line	Year	Annual Production (Bcf)	Operating Expenses	Depreciation	Return Rate	Revenue Requirement	Effective Cost (\$/MMBtu)	FPL Gas Price Forecast (\$/MMBtu)	Undiscounted Customer Savings	FPL Discount Factor	Discounted Customer Savings
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
1	2015	15.6					\$3.48	\$4.02	\$8.4	0.9302	\$7.8
2	2016	16.8					\$3.58	\$4.30	\$12.0	0.8649	\$10.4
3	2017	11.3					\$4.05	\$4.70	\$7.4	0.8043	\$5.9
4	2018	8.7					\$4.48	\$5.74	\$10.9	0.7480	\$8.1
5	2019	7.1					\$5.09	\$5.89	\$5.7	0.6956	\$3.9
6	2020	6.1					\$4.92	\$6.03	\$6.8	0.6468	\$4.4
7	2021	5.3					\$5.10	\$6.13	\$5.4	0.6015	\$3.3
8	2022	4.7					\$5.28	\$6.33	\$5.0	0.5594	\$2.8
9	2023	4.3					\$5.45	\$6.63	\$5.0	0.5202	\$2.6
10	2024	3.9					\$5.62	\$7.03	\$5.5	0.4837	\$2.7
11	2025	3.6					\$5.53	\$7.33	\$6.5	0.4498	\$2.9
12	2026	3.3					\$5.65	\$7.63	\$6.6	0.4183	\$2.8
13	2027	3.1					\$5.76	\$7.93	\$6.8	0.3890	\$2.6
14	2028	2.9					\$5.87	\$8.33	\$7.2	0.3617	\$2.6
15	2029	2.8					\$5.99	\$8.63	\$7.3	0.3364	\$2.4
16	2030	2.6					\$6.10	\$8.83	\$7.1	0.3129	\$2.2
17	2031	2.4					\$6.22	\$9.17	\$7.2	0.2910	\$2.1
18	2032	2.3					\$6.35	\$9.52	\$7.3	0.2705	\$2.0
19	2033	2.2					\$6.50	\$9.88	\$7.3	0.2516	\$1.8
20	2034	2.0					\$6.66	\$10.26	\$7.3	0.2340	\$1.7
21	2035	1.9					\$6.82	\$10.65	\$7.3	0.2176	\$1.6
22	2036	1.8					\$6.98	\$11.06	\$7.3	0.2023	\$1.5
23	2037-65	23.1					\$10.96	\$17.16	\$142.9	0.0894	\$12.8
24	Totals	137.8							\$300.0		\$91.0

Source: Response to OPC POD No. 12.

(2) Reflects 2% annual escalation of Transportation and Production O&M expenses.

FLORIDA POWER AND LIGHT COMPANY
Comparison of Projected Natural Gas Prices

<u>Line</u>	<u>Year</u>	<u>Current Forecast</u>	<u>FPL Forecast</u>	<u>Difference</u>	<u>Percent Difference</u>
		(1)	(2)	(3)	(4)
1	2015	\$3.86	\$4.02	(\$0.16)	-4.0%
2	2016	\$4.01	\$4.30	(\$0.29)	-6.8%
3	2017	\$4.15	\$4.70	(\$0.55)	-11.8%
4	2018	\$4.25	\$5.74	(\$1.49)	-25.9%
5	2019	\$4.35	\$5.89	(\$1.54)	-26.1%
6	2020	\$4.49	\$6.03	(\$1.55)	-25.6%
7	2021	\$4.62	\$6.13	(\$1.51)	-24.6%
8	2022	\$4.74	\$6.33	(\$1.60)	-25.2%
9	2023	\$4.82	\$6.63	(\$1.81)	-27.3%
10	2024	\$4.90	\$7.03	(\$2.14)	-30.4%
11	2025	\$4.97	\$7.33	(\$2.36)	-32.2%
12	2026	\$5.08	\$7.63	(\$2.55)	-33.4%
13	2027	\$5.51	\$7.93	(\$2.42)	-30.5%
14	2028	\$5.73	\$8.33	(\$2.60)	-31.2%
15	2029	\$6.00	\$8.63	(\$2.63)	-30.5%
16	2030	\$6.35	\$8.83	(\$2.48)	-28.1%
17	2031	\$6.69	\$9.17	(\$2.48)	-27.1%
18	2032	\$7.01	\$9.52	(\$2.51)	-26.4%
19	2033	\$7.39	\$9.88	(\$2.49)	-25.2%
20	2034	\$7.77	\$10.26	(\$2.49)	-24.3%
21	2035	\$8.13	\$10.65	(\$2.51)	-23.6%
22	2036	\$8.59	\$11.06	(\$2.47)	-22.3%
23	2037	\$8.95	\$11.48	(\$2.52)	-22.0%
24	2038	\$9.20	\$11.91	(\$2.72)	-22.8%
25	2039	\$9.53	\$12.37	(\$2.84)	-22.9%
26	2040	\$10.00	\$12.84	(\$2.84)	-22.1%
27	2041	\$10.56	\$13.33	(\$2.77)	-20.8%
28	2042	\$11.16	\$13.84	(\$2.68)	-19.4%
29	2043	\$11.79	\$14.36	(\$2.58)	-17.9%
30	2044	\$12.45	\$14.91	(\$2.46)	-16.5%
31	2045	\$13.15	\$15.48	(\$2.32)	-15.0%
32	2046	\$13.90	\$16.07	(\$2.17)	-13.5%
33	2047	\$14.68	\$16.68	(\$2.00)	-12.0%
34	2048	\$15.51	\$17.32	(\$1.81)	-10.4%
35	2049	\$16.38	\$17.97	(\$1.59)	-8.8%
36	2050	\$17.31	\$18.66	(\$1.35)	-7.2%

FLORIDA POWER AND LIGHT COMPANY
Comparison of Projected Natural Gas Prices

<u>Line</u>	<u>Year</u>	<u>Current Forecast</u>	<u>FPL Forecast</u>	<u>Difference</u>	<u>Percent Difference</u>
37	2051	\$18.28	\$19.36	(\$1.08)	-5.6%
38	2052	\$19.31	\$20.10	(\$0.79)	-3.9%
39	2053	\$20.40	\$20.87	(\$0.46)	-2.2%
40	2054	\$21.55	\$21.66	(\$0.11)	-0.5%
41	2055	\$22.77	\$22.48	\$0.28	1.3%
42	2056	\$24.05	\$23.34	\$0.71	3.0%
43	2057	\$25.40	\$24.22	\$1.18	4.9%
44	2058	\$26.83	\$25.14	\$1.69	6.7%
45	2059	\$28.34	\$26.10	\$2.24	8.6%
46	2060	\$29.93	\$27.09	\$2.84	10.5%
47	2061	\$31.62	\$28.12	\$3.50	12.5%
48	2062	\$33.40	\$29.19	\$4.21	14.4%
49	2063	\$35.28	\$30.30	\$4.98	16.4%
50	2064	\$37.26	\$31.45	\$5.81	18.5%

Source: (1) 2015 through 2026 is average 30 day closing price of Henry Hub Futures (8/20/2014 - 9/18/2014) obtained from SNL Financial.

2027 through 2040 prices were escalated based on annual increases from the Energy Information Administration (EIA).

2041 through 2064 prices were escalated based on average EIA annual increases from 2012-2040.

Perryville basis adjustment was applied to all prices.

(2) Response to OPC POD No. 12. Confidential

FLORIDA POWER AND LIGHT COMPANY
 Base Production Cost/Benefit Analysis
 Updated Gas Price Forecast
 (\$ in Millions)

Line	Year	Annual Production (Bcf)	Operating Expenses	Depreciation	Return Rate	Revenue Requirement	Effective Cost (\$/MMBtu)	Current Price Forecast (\$/MMBtu)	Undiscounted Customer Savings	FPL Discount Factor	Discounted Customer Savings
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
1	2015	15.6					\$3.48	\$3.86	\$5.9	0.9302	\$5.5
2	2016	16.8					\$3.56	\$4.01	\$7.5	0.8649	\$6.5
3	2017	11.3					\$4.00	\$4.15	\$1.7	0.8043	\$1.4
4	2018	8.7					\$4.40	\$4.25	(\$1.2)	0.7480	(\$0.9)
5	2019	7.1					\$4.96	\$4.35	(\$4.4)	0.6956	(\$3.0)
6	2020	6.1					\$4.79	\$4.49	(\$1.8)	0.6468	(\$1.2)
7	2021	5.3					\$4.94	\$4.62	(\$1.7)	0.6015	(\$1.0)
8	2022	4.7					\$5.08	\$4.74	(\$1.6)	0.5594	(\$0.9)
9	2023	4.3					\$5.21	\$4.82	(\$1.7)	0.5202	(\$0.9)
10	2024	3.9					\$5.34	\$4.90	(\$1.7)	0.4837	(\$0.8)
11	2025	3.6					\$5.24	\$4.97	(\$1.0)	0.4498	(\$0.4)
12	2026	3.3					\$5.32	\$5.08	(\$0.8)	0.4183	(\$0.3)
13	2027	3.1					\$5.39	\$5.51	\$0.4	0.3890	\$0.1
14	2028	2.9					\$5.46	\$5.73	\$0.8	0.3617	\$0.3
15	2029	2.8					\$5.52	\$6.00	\$1.3	0.3364	\$0.4
16	2030	2.6					\$5.58	\$6.35	\$2.0	0.3129	\$0.6
17	2031	2.4					\$5.65	\$6.69	\$2.5	0.2910	\$0.7
18	2032	2.3					\$5.71	\$7.01	\$3.0	0.2705	\$0.8
19	2033	2.2					\$5.80	\$7.39	\$3.4	0.2516	\$0.9
20	2034	2.0					\$5.88	\$7.77	\$3.8	0.2340	\$0.9
21	2035	1.9					\$5.97	\$8.13	\$4.1	0.2176	\$0.9
22	2036	1.8					\$6.05	\$8.59	\$4.5	0.2023	\$0.9
23	2037-65	23.1					\$7.88	\$15.82	\$183.1	0.0894	\$16.4
24	Totals	137.8							\$208.2		\$26.8

Source: Response to OPC POD No. 12.

(7) Current gas price forecast shown on Exhibit JP-2.



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News Article

NORTHWESTERN ENERGY PURCHASES BATTLE CREEK NATURAL GAS FIELD

Sep 22, 2010

NorthWestern Energy announces it has purchased a majority interest in the Battle Creek Natural Gas Field on the Sweetgrass Arch in Blaine County, Montana, from a private owner.

Butte, Mont. – Sept. 22, 2010 – NorthWestern Corporation d/b/a NorthWestern Energy (NYSE: NWE) today announced that it has purchased a majority interest in the Battle Creek Natural Gas Field on the Sweetgrass Arch in Blaine County, Montana (“Battle Creek Field”), from a private owner. The purchase also includes the seller’s interest in the Battle Creek Gas Gathering System Joint Venture.

The Battle Creek Field purchase consists of the seller’s interests in producing wells and a gathering system. The amount of net proven developed producing reserves purchased are estimated to be 7.6 billion cubic feet (“Bcf”). Annual net production attributable to the purchase is currently approximately 0.5 Bcf or about 2.2% of NorthWestern’s current annual consumption in Montana.

“Owning natural gas reserves is intended to provide customers with a source of rate-based energy that helps hedge against price volatility,” said Bob Rowe, President and CEO. “We are excited that we were able to purchase this relatively small production field which already serves our natural gas customers under a soon-to-expire purchase agreement. With this acquisition, we will continue to dedicate this resource to our natural gas customers and will not use it as a source of supply for our soon-to-be-completed Mill Creek generation station.”

Under the terms of the agreement, NorthWestern paid the seller \$11.4 million cash for the majority interest in the Battle Creek Field assets including the gathering system. NorthWestern funded the transaction by drawing on its revolving credit facility, which after the purchase has an availability of approximately \$160 million.

“We plan to seek approval of the Montana Public Service Commission to add our interest in the Battle Creek Field and the gathering system into our regulated rate base,” added Rowe. “It is both in our service territory, near Havre, Montana, and connected to our existing natural gas system. In addition, acquiring this well-defined and established producing field is consistent with our low risk profile by staying away from exploration.”

During the 2009 Montana legislative session, changes in state law occurred that allow NorthWestern to acquire natural gas production and gathering resources and, subject to regulatory approval, include them in the rate base.

About NorthWestern Energy

NorthWestern Energy is one of the largest providers of electricity and natural gas in the Upper Midwest and Northwest, serving approximately 661,000 customers in Montana, South Dakota and Nebraska. More information on NorthWestern Energy is available on the Company’s Web site at www.northwesternenergy.com.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery Clause With Generating Performance Incentive Factor	DOCKET NO. 140001-EI Filed: September 22, 2014
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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, 12647 Olive Blvd., Suite 585, St. Louis, Missouri 63141. We have been retained by Florida Industrial Power Users Group to testify in this proceeding on its behalf;
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony and Exhibits, which have been prepared in written form for introduction into evidence in Florida Public Service Commission Docket No. 140001-EI; and,
3. I hereby swear and affirm that the answers contained in my testimony and the information in my exhibits are true and correct.

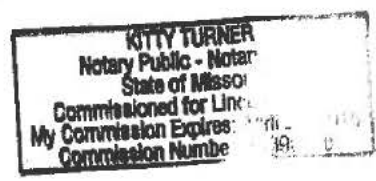


Jeffry Pollock

Subscribed and sworn to before me this 22nd day of September, 2014.



Kitty Turner, Notary Public
Commission #: 11390610



My Commission expires on April 25, 2015.