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DANIEL PEREZ
*Speaker of the House of
Representatives*

June 30, 2025

Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 20250029 GU-EI- Petition for rate increase by Peoples Gas System Inc.

Dear Mr. Teitzman:

Please find enclosed for filing in the above referenced docket the Direct Testimony and Exhibits of Lane Kollen. This filing is being made via the Florida Public Service Commission's web-based electronic filing portal.

If you have any questions or concerns, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

Walt Trierweiler
Public Counsel

/s/ Charles J. Rehwinkel
Charles J. Rehwinkel
Deputy Public Counsel
Florida Bar No.: 527599

CERTIFICATE OF SERVICE
DOCKET NO. 20250029-GU

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 30th day of June, 2025, to the following:

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**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for rate increase by Peoples Gas
System, Inc.

DOCKET NO.: 20250029-GU

FILED: June 30, 2025

**DIRECT TESTIMONY
OF
LANE KOLLEN
ON BEHALF
OF
THE CITIZENS OF THE STATE OF FLORIDA**

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DIRECT TESTIMONY

OF

LANE KOLLEN

On Behalf of the Citizens of the State of Florida

Before the

Florida Public Service Commission

Docket No. 20250029-GU

I. QUALIFICATIONS AND SUMMARY

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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Lane Kollen. My business address is J. Kennedy and Associates, Inc. (“Kennedy and Associates”), 570 Colonial Park Drive, Suite 305, Roswell, Georgia 30075.

Q. DESCRIBE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A. I earned a Bachelor of Business Administration degree in accounting and a Master of Business Administration degree from the University of Toledo. I also earned a Master of Arts degree in theology from Luther Rice University. I am a Certified Public Accountant, with a practice license, Certified Management Accountant, and Chartered Global Management Accountant. I am a member of numerous professional organizations, including the American Institute of Certified Public Accountants, Institute of Management Accounting, Georgia Society of CPAs, and Society of Depreciation Professionals.

I have been an active participant in the utility industry for more than forty years, initially as an employee of a company that installed underground cablevision and telephone

1 wire from 1974 to 1976, then as an employee of The Toledo Edison Company in various
2 accounting and planning positions from 1976 to 1983, and as a consultant in the industry
3 from 1983 to the present. I have testified as an expert on planning, ratemaking, accounting,
4 finance, tax, and other issues in proceedings before regulatory commissions and courts at
5 the federal and state levels on several hundreds of occasions.

6 I have testified before the Florida Public Service Commission (FPSC or
7 Commission) in numerous dockets, including base rate, storm cost, fuel adjustment clause,
8 acquisition, and territorial proceedings involving Peoples Gas System, Inc. (Company or
9 PGS), Florida Power & Light Company (FPL), Duke Energy Florida (DEF), Florida Public
10 Utilities Company, Gulf Power Company, Talquin Electric Cooperative, Tampa Electric
11 Company, City of Tallahassee, and City of Vero Beach.¹

12
13 **Q. ON WHOSE BEHALF ARE YOU PROVIDING TESTIMONY IN THIS**
14 **PROCEEDING?**

15 A. I am providing testimony on behalf of the Florida Office of Public Counsel (OPC), which
16 represents the citizens of the State of Florida, and specifically, in the context of this
17 proceeding, the Company's customers. J. Kennedy and Associates was retained to review
18 and make recommendations in response to the Company's Petition, including the claimed
19 initial and subsequent year base revenue requirements, the two requested base revenue
20 increases, and the supporting documentation provided in this proceeding.

¹ I have attached a more detailed description of my qualifications and appearances as an expert in Exhibit LK-1.

1 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

2 A. The purpose of my testimony is to address, make recommendations, and quantify the
3 effects of my recommendations as the result of my review of the Company's claimed base
4 revenue requirements and requested revenue increases, as well as to quantify the effects of
5 the recommendations made by OPC witness David Garrett regarding the Company's
6 proposed capital structure and cost of equity on the claimed base revenue requirement and
7 requested revenue increases.

8

9 **Q. PROVIDE A BRIEF DESCRIPTION OF THE COMPANY'S REQUESTED**
10 **REVENUE INCREASES.**

11 A. The Company seeks an initial base revenue increase of \$103.591 million effective on
12 January 1, 2026 based on the "rate case budgets" that it developed specifically for the
13 forecast test year 2026. That base revenue increase is partially offset by a reduction of
14 \$6.733 million in the Cast iron/Bare Steel Replacement rider (Rider CI/BSR) revenues due
15 to the transfer of the Rider CI/BSR costs to the base revenue requirement. After the
16 reduction in the Rider CI/BSR revenue requirement, the requested net revenue increase is
17 \$96.858 million.

18 The Company seeks a second year base revenue increase, characterized as a
19 subsequent year adjustment (SYA), of \$26.709 million effective on January 1, 2027. This
20 second year base revenue increase is to recover increases in forecast plant related rate base
21 costs in 2027 compared to the forecast plant related rate base costs in the test year,
22 including the related increases to annualize depreciation and property tax expenses
23 compared to the test year. This second-year revenue increase reflects only selective

1 increases in costs; it does not reflect increases in base revenues, including those from the
2 increase in customers at the beginning of 2027 compared to the forecast customers in the
3 test year.

4
5 **Q. PROVIDE A SUMMARY OF YOUR TESTIMONY.**

6 A. I recommend an initial base revenue increase of no more than \$29.813 million. This is a
7 reduction of at least \$73.778 million in the Company's claimed initial base revenue
8 requirement and requested revenue increase. This reduction in the Company's initial
9 request is based on my recommendations on specific issues that I subsequently address in
10 greater detail and based on my quantifications of Mr. Garrett's recommendations regarding
11 the Company's capital structure and cost of equity. I summarize the issues that I and Mr.
12 Garrett address and the effects of our recommendations on the following table.²

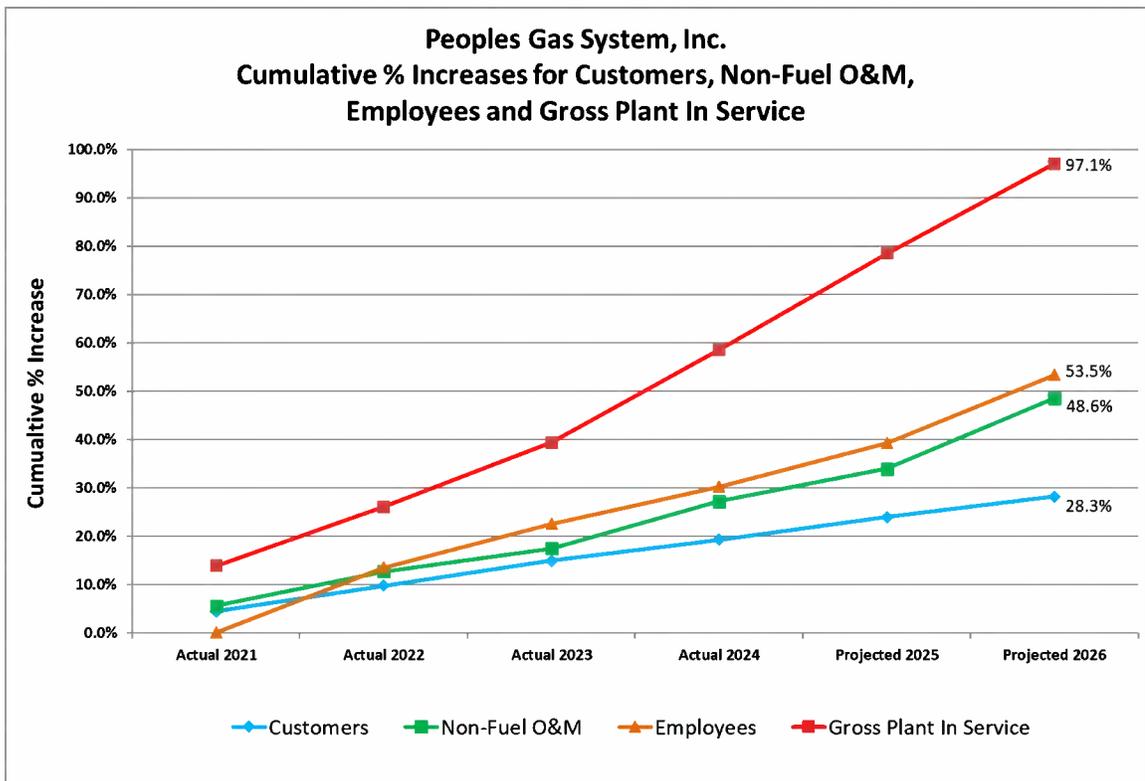
² OPC plans to provide the calculations supporting the amounts on the following table and cited elsewhere throughout my testimony in an Excel workbook in live format and with all formulas intact shortly after my testimony is filed in response to the Company's request.

PEOPLES GAS SYSTEM, INC.
REVENUE REQUIREMENT RECOMMENDED BY OPC - BASE RATES
DOCKET NO. 20250029-GU
TEST YEAR ENDING DECEMBER 31, 2026
(\$ MILLIONS)

	<u>Adjustment Before Gross Up</u>	<u>Gross-Up Factor</u>	<u>Adjustment After Gross Up</u>
Base Rate Increase Requested by Company Per Filing			103.591
Operating Income Adjustments:			
Reduce Depreciation Expense to Limit Growth in Capital Expenditures	(1.707)	1.00789	(1.721)
Reduce Depreciation Expense to Reflect Restatement of Test Year CWIP Closures to Plant	(3.418)	1.00789	(3.445)
Reduce Payroll and Related Expenses for Reduction in Projected Staffing Increases	(6.028)	1.00789	(6.075)
Increase Off-System Sales Net Revenues Included in Base Rates to Reflect 4-Year Average	(1.506)	1.00789	(1.518)
Increase Off-System Sales Net Revenues to Reflect PGS's Requested 50/50 Sharing	(4.152)	1.00789	(4.184)
Remove Excessive Property Tax Expense Using Corrected Net Operating Income	(0.777)	1.00789	(0.783)
Remove SERP Expense	(0.124)	1.00789	(0.125)
Reduce Board of Directors Expenses to Correct Filing Error	(0.105)	1.00789	(0.106)
Remove 50% of D&O Insurance Expense to Share with Shareholders	(0.037)	1.00789	(0.037)
Remove 50% of Investor Relations Expense to Share with Shareholders	(0.021)	1.00789	(0.021)
Remove 50% of Board of Directors Expenses to Share with Shareholders	(0.116)	1.00789	(0.117)
Reflect Amortization of WAM Costs Over 20 Years Instead of 15 Years	(0.718)	1.00789	(0.723)
Increase Parent Debt Income Tax Adjustment, Grossed Up for Income Taxes	(0.264)	1.00789	(0.266)
Rate Base Adjustments:			
Reduce Plant, Net of A/D, to Limit Growth on Capital Expenditures			(5.989)
Adjust A/D to Reflect Restatement of Test Year CWIP Closures to Plant			0.162
Adjust Accum Amortization of WAM Costs Over Extended Amortization Period			0.034
Capital Structure and Rate of Return Adjustments:			
Adjust Capital Structure - Financial Capital Structure of 51% Debt 49% Equity			(13.709)
Set Return on Equity at 9.0%			(35.154)
Total OPC Adjustments			<u>(\$73.778)</u>
Maximum Base Rate Increase After OPC Adjustments			<u>\$29.813</u>

1 The Company’s initial requested increase is excessive and due, in large part, to
2 Emera’s corporate financial objectives to grow revenues and earnings in its Florida
3 regulated utility businesses, which include PGS, Tampa Electric Company, and SeaCoast
4 Gas Transmission, LLC (“SeaCoast”). The requested increase in revenues is driven by
5 increases in actual and forecast costs, primarily the growth in gross plant in service and
6 operating expenses, including payroll costs for significant increases in employees (team
7 members).

1 The Company contributes to the achievement of the Emera corporate financial
 2 objectives through outsized actual and continuing forecast growth in capital expenditures
 3 included as construction work in progress (CWIP) and gas plant in service investments in
 4 rate base and the related growth in depreciation and property tax expenses, outsized actual
 5 and continuing forecast growth in non-gas operating expenses, and actual and continuing
 6 forecast growth in team member staffing and the related payroll, benefits, and other taxes
 7 expenses. The growth in gross plant and O&M expenses since 2020, including the
 8 Company’s forecast growth in 2025 and 2026, far exceeds actual and forecast customer
 9 growth as shown on the following chart.



11 The Commission has the obligation, opportunity, and ability to set the revenue
 12 requirement based on reasonable forecasts of revenues and costs and thereby reduce the
 13

1 magnitude of the Company's two requested base revenue increases in this proceeding. In
2 the absence of Commission action to rein in the Company's "rate case" budget increases
3 in costs in the forecast test year in this proceeding, prepared specifically for this rate case
4 prior to and outside the normal budget process, and the costs forecast in subsequent years,
5 the effects of these unreasonable cost levels will continue to be imposed on customers in
6 the form of excessive and unreasonable and increasingly less affordable revenue increases
7 in this case and in future cases.

8 In addition to the adjustments to the requested initial revenue increase, I
9 recommend the Commission deny altogether the Company's second year requested base
10 revenue increase. The Company's second year requested increase is based on selective cost
11 increases and fails to reflect the additional revenues it will receive in 2027 from the
12 customer growth already experienced in 2026, but which is not fully annualized in the test
13 year, and reductions in plant-related costs. However, if the Commission allows the
14 Company's requested selective cost increases to annualize the return on test year end plant-
15 related components of rate base and the related depreciation and property tax expenses,
16 then I recommend the Commission also increase the base revenues to annualize the growth
17 in customers through the end of the test year, reflect the savings from reductions in plant-
18 related costs, reduce the effects of the Company's proposed plant related costs for the
19 reductions to the forecast capital expenditures I recommend for the test year, and reflect
20 the reductions in the cost of capital that Witness Garrett recommends. The adjustments
21 that I recommend if the Commission does not reject the requested second year increase
22 altogether are necessary to properly recognize the increases in revenues from customer
23 growth, the reductions in plant related costs as offsets to the requested increases in plant

1 related costs, the other reductions to capital expenditures and for error corrections, and the
2 cost of capital carried forward from the test year into 2027.

3 Finally, I quantify the effects on the requested rate increase of Mr. Garrett’s capital
4 structure and return on equity recommendations on both the first base revenue increase in
5 2026 and the second year increase in 2027, in the event the second year increase is not
6 altogether denied.

7
8 **II. THE FORECASTS OF TEST YEAR COSTS ARE OVERSTATED IN ORDER**
9 **TO ACHIEVE EMERA’S CORPORATE FINANCIAL OBJECTIVES**

10 **A. Emera Investor Presentations Describe Its Financial Objectives And Its Plan To**
11 **Achieve Those Objectives Through Growth In Capital Expenditures, Revenues,**
12 **And Earnings at PGS**

13
14 **Q. DESCRIBE EMERA’S MARCH AND APRIL 2025 INVESTOR PRESENTATION.**

15 A. Emera’s March and April 2025 Investor Presentation deck describes its financial objectives
16 and its plan to achieve those objectives through growth in capital expenditures, revenues,
17 and earnings at PGS.³ Emera achieved 70% of its income in 2024 from its “premium
18 portfolio of regulated utilities focused in Florida” and plans to drive revenue and earnings
19 growth through its “capital plan focused in Florida.”⁴

20 Emera plans to achieve earnings growth of 5% to 7% by growing rate base by 7%
21 to 8% annually on a compound average basis at least through 2029.⁵ Emera considers

³ I have attached a copy of the Emera presentation as Exhibit LK-2.

⁴ *Id.* at 5-7.

⁵ *Id.* at 14.

1 Florida to be a “constructive” regulatory environment due to its ability to achieve revenue
2 growth through rate increases based on actual and forecast growth in rate base from its
3 actual and forecast capital expenditures, the use of forecast test years some two years after
4 its most recent actual historic calendar year data, and other utility beneficial ratemaking
5 mechanisms.⁶

6 Emera states that “clear financial objectives drive reliable outcomes” and lists its
7 objectives on the following slide from the presentation deck:⁷

Clear Financial Objectives Drive Reliable Outcomes



8
9 Emera sets “clear financial objectives” to “drive reliable outcomes” for its utilities,
10 including PGS, and funds the equity investments for the planned PGS capital expenditures
11 necessary to achieve those financial objectives, including the “clear financial objective” to
12 “deliver 7-8% rate base CAGR through 2029” and “translate rate base growth into 5%-7%
13 annual adjusted EPS growth.”⁸

⁶ *Id.* at 6 and 12.

⁷ *Id.* at 15.

⁸ *Id.*

1 The Emera forecast of PGS capital expenditures included in this Investor
2 Presentation reflects compound annual growth in PGS gross plant of 11.5% from the end
3 of 2024 to the end of the test year in this case and compound annual growth in PGS gross
4 plant of 11.6% from the end of 2024 through the end of 2029. The Emera forecast of PGS
5 capital expenditures totals \$2,360 million over the 2025 to 2029 five-year period,
6 consisting of \$360 million in 2025, \$430 million in 2026, \$510 million in 2027, \$560
7 million in 2028, and \$500 million in 2029.⁹

8
9 **Q. DESCRIBE HOW CAPITAL EXPENDITURES RESULT IN GROWTH IN**
10 **REVENUES AND EARNINGS.**

11 A. Growth in revenues results from ongoing rate increases based on the grossed-up (for
12 income taxes) return (based on the weighted average cost of capital or WACC) times the
13 growth in rate base in the test year compared to the rate base reflected in the prior rate case
14 plus incremental revenues from growth in customers plus or minus changes in weather
15 normalized gas sales.

16 The weighted equity component of the WACC applied to rate base represents the
17 earnings component of the revenue requirement. The growth in rate base times the equity
18 component of the WACC drives the growth in earnings, all else equal. In other words, the
19 key driver for earnings growth is the growth in the rate base and the key driver for growth
20 in the rate base is capital expenditures.

21

⁹ *Id.* at 39.

1 **Q. IS THAT WHY EMERA AND PGS ARE FOCUSED ON GROWTH IN CAPITAL**
2 **EXPENDITURES?**

3 A. Yes. That is how Emera actually achieves and plans to continue to achieve its corporate
4 financial objectives of growth in revenues and earnings, as demonstrated by Emera’s
5 March and April 2025 Investor Presentation. Emera and PGS are incentivized to grow rate
6 base in order to increase earnings, an opportunity for and well-known “reliable outcome”
7 that is unique to rate regulated utilities, one that is described in the economic academic
8 literature as the Averch-Johnson effect,¹⁰ and is borne out in practice through excessive
9 capital expenditures by utilities such as PGS.

10 There is no market or competitive restraint on the growth in rate base or the
11 increases in revenues due to the monopolistic characteristic of rate regulated utilities that
12 allows, and indeed, incentivizes and rewards this phenomenon. This is particularly true in
13 those jurisdictions that use forecast costs in future test years to determine the revenue
14 requirement. The only practical restraint to the utility’s forecast of excessive and
15 unreasonable costs is the regulator, in this case, the Commission, which must assess
16 whether the forecast capital expenditures and growth in rate base are reasonable or whether
17 the forecast of capital expenditures need to be reined in before the costs actually are
18 incurred. The opportunity for rate regulated utilities to grow revenues and earnings through
19 unreasonable and excessive growth in rate base, of course, is a harm to the utility’s

¹⁰ The Averch–Johnson effect is the tendency of regulated companies to engage in excessive amounts of capital accumulation in order to expand the volume of their profits. If companies' profits to capital ratio is regulated at a certain percentage then there is a strong incentive for companies to over-invest in order to increase profits overall. This investment goes beyond any optimal efficiency point for capital that the company may have calculated as higher profit is almost always desired over and above efficiency. Averch, Harvey; Johnson, Leland L. (1962). "Behavior of the Firm Under Regulatory Constraint." *American Economic Review*. 52 (5): 1052–1069. I obtained this citation from a secondary source and do not have a copy of the original article.

1 customers, who ultimately are the parties charged unreasonable rates to provide recovery
2 of the utility's excessive and unreasonable costs.

3
4 **B. The Company Developed Its Capital Expenditure And Operating Budgets**
5 **Specifically For This Rate Case And Those Rate Case Budgets Reflect Excessive Costs**

6 **Q. DESCRIBE THE COMPANY'S CAPITAL EXPENDITURE AND OPERATING**
7 **"BUDGETS" DEVELOPED SPECIFICALLY FOR THIS RATE CASE.**

8 A. The Company developed "rate case" capital expenditure and operating budgets for 2026
9 specifically and uniquely for this rate case nearly a year prior to and outside the normal
10 timeline for the Company's actual capital expenditure and operating budgets.¹¹ The claim
11 by Company witness Andrew Nichols in direct testimony that "Peoples prepared its 2026
12 projected test year financial data using the company's normal annual budget process, which
13 includes developing forecasts for capital expenditures and other balance sheet items and
14 all elements of its income statement"¹² is incorrect and misleading. The Company began
15 developing the "rate case" capital expenditure and operating expense budgets for the 2026
16 test year late last year, nearly a year before it will develop the budgets for 2026 used by
17 management to actually manage the Company under the normal budget timeline.

18
19 **Q. WHY IS THE DISTINCTION BETWEEN THE "RATE CASE" BUDGETS**
20 **DEVELOPED SPECIFICALLY FOR THIS RATE CASE PROCEEDING AND**

¹¹ Response to Interrogatory No. 100 in OPC's Second Set of Interrogatories. I have attached a copy of this response as my Exhibit LK-3.

¹² Direct Testimony of Andrew Nichols at 10.

1 **BUDGETS DEVELOPED IN THE NORMAL COURSE OF BUSINESS**
2 **IMPORTANT IN THIS PROCEEDING?**

3 A. It is important because the “rate case” budgets for the 2026 test year were developed
4 specifically for this rate case proceeding, and were not actually developed in the normal
5 course of business for management and accountability purposes. Rather, the forecasts for
6 2026 were developed to support the requested rate increase and incorporate assumptions
7 and methodologies that bias upward the Company’s requested increase compared to the
8 assumptions and methodologies that may be incorporated in the normal budgets for 2026
9 that will be developed or refined later this year or early next year and that will not be
10 approved until November this year (or later).¹³

11 It is important because these “rate case” budgets, to the extent accepted by the
12 Commission and reflected in the approved rate increases, essentially become self-fulfilling
13 in the real world, meaning the Company’s capital expenditure and operating expense spend
14 rates increase if they are funded through the approved rate increases. To the extent the
15 Commission reduces the costs reflected in the “rate case” budgets and then reduces the
16 requested rate increases, the Company responds in the real world by reducing its actual
17 budgets and spend rates for the rate effective periods to ensure that it earns its authorized
18 return on equity. In other words, the greater the approved rate increases, the greater the
19 spending. The lower the approved rate increase, the lower the spending.

¹³ The Company’s timeline for developing the “rate case” capital expenditures, O&M expense, labor, other operating expenses, and revenues budgets for the rate case was provided in response to POD No. 42 in OPC’s Second Request for Production of Documents. I have attached a copy of this response as Exhibit LK-17. This timeline for the “rate case” budgets also was confirmed and discussed with Company witnesses Timothy O’Connor, Andrew Nichols, Luke Buzard, and Christian Richard taken in this proceeding.

1 always review our core priorities, i.e., safely and reliably serving both our current
2 and new customers. Updating the forecasts we use to manage our operations and to
3 serve customers is part of running our business. We took reasonable actions to
4 modestly adjust our business plans to ensure that we could provide excellent
5 customer service, executed the plans, and had reasonable financial results in 2024.
6

7 It also is important because the effects of the outsized spend rates result in
8 increasing customer rates and harm to customers in the real world. If spend rates are
9 unreasonable and reflected in customer rates, then those rates are unreasonable.
10

11 **C. The “Rate Case” Capital Expenditure Budget For The Test Year Reflects Excessive**
12 **Costs**

13 **Q. DESCRIBE THE FORECAST CAPITAL EXPENDITURES FOR 2025 AND 2026**
14 **THAT ARE REFLECTED IN THE CWIP AND PLANT RELATED COSTS IN THE**
15 **TEST YEAR.**

16 A. PGS developed its rate case capital expenditure budget for the 2026 test year starting in
17 late 2024.¹⁶ It initially started with a combination of actual and budget capital expenditures
18 for 2024 and forecast capital expenditures for 2025 and 2026. It also forecast closings of
19 these capital expenditures to gas plant in service for the remainder of 2024, all of 2025 and
20 all of 2026. The following table shows the Company’s forecast capital expenditures for
21 2025 and 2026 and the growth in those capital expenditures compared to the actual 2024
22 capital expenditures by plant groupings as follows.¹⁷

¹⁶ *Id.*

¹⁷ Andrew Nichols Exhibit AN-1, Document 2.

**Peoples Gas System, Inc.
2025 and 2026 Capital Budget**

Project/Spend Type	2024 Actual	2025 Budget	2026 Budget
New Revenue Mains	\$ 55,330,502	\$ 59,575,821	\$ 87,353,788
New Revenue Mains - AFUDC	431,351	-	-
New Revenue Services	64,553,998	63,907,851	62,695,336
New Revenue Meters and Regulators	29,402,109	25,710,006	24,641,602
New Revenue Measuring and Regulation Station Equipment	2,257,555	983,781	1,810,783
CNG & RNG Interconnection Pipeline	6,296,823	25,541,419	9,473,633
Total Growth	158,272,338	175,718,879	185,975,142
Distribution System Improvements	3,960,693	22,376,667	60,670,453
Main Replacements	19,409,453	23,513,793	25,776,018
Main Replacements - Downtown Tampa - AFUDC	-	4,308,651	27,600,000
Service Line Replacements	6,788,806	14,496,694	14,364,228
Municipal Improvements	16,453,319	18,325,584	16,303,268
Municipal Improvements - US 98 Relocation - AFUDC	23,843,996	5,872,059	-
Meters and Regulators	3,634,050	4,529,431	3,474,356
AMI Pilot	-	2,200,000	4,000,000
Measuring and Regulation Station Equipment	343,479	1,899,102	17,048,696
Measuring and Regulation Improvements	-	-	150,000
Cathodic Protection	2,850,639	2,294,169	2,719,400
Improvements to Property	2,831,019	4,133,428	13,025,168
PGS Project Tampa Building - AFUDC	31,841,875	14,753,518	-
Communication Equipment	41,153	13,000	13,000
Misc. Non-Revenue Producing	41,685	-	-
Office Equipment	246,023	596,095	518,000
Power Operated Equipment	434,707	876,000	1,239,560
Testing and Measuring Equipment	825,779	657,629	610,264
Tools and Shop Equipment	1,016,619	787,700	1,040,692
Transportation Vehicles	8,268,951	4,617,425	6,500,000
Technology Projects	5,173,014	14,391,429	21,880,000
Technology Projects (Shared)	3,459,766	3,874,506	7,365,636
Total Reliability, Resiliency, and Efficiency	131,465,027	144,516,881	224,298,739
Cast Iron/Bare Steel Pipe Replacement	7,593,574	4,535,613	3,919,350
Problematic Plastic Pipe Replacement	16,802,030	32,014,587	60,437,371
Total Legacy	24,395,604	36,550,200	64,356,720
TOTAL	\$ 314,132,968	\$ 356,785,959	\$ 474,630,601
Business Area	2024 Actual	2025 Budget	2026 Budget
Gas Operations Capital Projects	\$ 44,320,477	\$ 62,737,202	\$ 79,262,157
Engineering, Construction and Technology Capital Projects	236,830,773	277,282,240	392,497,444
Customer Experience Enhancement Projects	1,139,844	2,013,000	2,871,000
Corporatate Headquarters Project	31,841,875	14,753,518	-
	\$ 314,132,968	\$ 356,785,959	\$ 474,630,601

1

2 The preceding table shows that some of the capital expenditures are for unique

3 projects that have been or will be completed prior to the test year. These projects should be

4 removed from the 2024 and 2025 construction totals in comparing the total capital

5 expenditures on a “normalized” basis in 2026 to the two prior years. Projects that will be

6 completed prior to the test year include the Municipal Improvements - US 98 Relocation –

7 AFUDC and PGS Project Tampa Building – AFUDC projects. The completion of these

8 projects prior to the test year should result in reductions in test year capital expenditures of

1 \$23.844 million compared to 2024 and \$5.872 million compared to 2025 for the Municipal
2 Improvements - US 98 Relocation – AFUDC and reductions of \$31.842 million compared
3 to 2024 and \$14.754 million compared to 2025 for the PGS Project Tampa Building –
4 AFUDC, all else equal.

5 However, all else is not equal. The table shows capital expenditures in new
6 categories/projects starting in 2025 or 2026 and, for those projects started in 2025, show
7 significant growth in 2026 compared to 2025. These new categories/projects are
8 discretionary and/or could be delayed. The projects include Main Replacements -
9 Downtown Tampa – AFUDC with forecast capital expenditures of \$4.309 million in 2025
10 and \$27.600 million in 2026 and AMI Pilot with forecast capital expenditures of \$2.000
11 million in 2025 and \$4.000 million in 2026. Both of these projects were included in the
12 forecast capital expenditures in the last rate case, but the Company subsequently delayed
13 them, evidence of the Company’s discretionary ability to reduce and/or delay capital
14 expenditures, temporarily avoid the costs related to those expenditures, retain the revenues
15 authorized to recover the costs that were not incurred, and in that manner enhance earnings
16 between rate cases.

17 The table also shows there is outsized growth in certain other categories in 2026
18 compared to 2024 and 2025. This outsized growth is discretionary and far exceeds that
19 justified by customer growth, to the extent there actually is a correlation between spend
20 rates and customer growth in the category, and/or inflation. These outsized growth
21 categories include New Revenue Mains with forecast capital expenditures of \$87.354
22 million in 2026 compared to \$55.331 million in 2024 and \$59.576 million in 2025,
23 Distribution System Improvements with forecast capital expenditures of \$60.670 million

1 in 2026 compared to \$3.961 million in 2024 and \$22.377 million in 2025, Measuring and
2 Regulation Station Equipment with forecast capital expenditures of \$17.049 million in
3 2026 compared to \$0.343 million in 2024 and \$1.899 million in 2025, Improvements in
4 Property with forecast capital expenditures of \$13.025 million in 2026 compared to \$2.831
5 million in 2024 and \$4.133 million in 2025, Technology Projects with forecast capital
6 expenditures of \$21.880 million compared to \$5.173 million in 2024 and \$14.391 million
7 in 2025, Technology Projects (Shared) with forecast capital expenditures of \$7.366 million
8 in 2026 compared to \$3.460 million in 2024 and \$3.875 million in 2025, and Problematic
9 Plastic Pipe Replacement with forecast capital expenditures of \$60.437 million in 2026
10 compared to \$16.802 million in 2024 and \$32.015 million in 2025.

11
12 **Q. IS THIS OUTSIZED GROWTH IN THE CATEGORIES IN 2026 LISTED IN THE**
13 **PRIOR ANSWER REASONABLE WHEN COMPARED TO ACTUAL 2024 AND**
14 **FORECAST 2025 CAPITAL EXPENDITURES?**

15 A. No. The forecast growth in these categories is discretionary and is not justified by customer
16 growth and/or inflation in 2025 or 2026. The Company's forecast growth in these
17 categories is 57.30% in 2025 compared to 2024 actual capital expenditures. The
18 Company's "rate case" capital expenditure budget further compounds the outsized forecast
19 growth in 2025 with additional forecast growth in these categories of 93.67% in 2026
20 compared to 2025 and cumulative growth of 204.643% compared to 2024. In contrast, the
21 Company's "rate case" budget reflects forecast customer growth forecast of 7.58% in 2026

1 compared to 2024, inflation growth of 4.89% in 2026 compared to 2024; and combined
2 customer and inflation growth of 12.84% in 2026 compared to 2024.¹⁸

3 In addition, the Company’s forecast growth in the Problematic Plastic Pipe (“PPP”)
4 Replacement represents a significant acceleration of the present replacement of this pipe
5 to a level nearly four times the actual 2024 capital expenditures and nearly double the
6 forecast 2025 capital expenditures. This forecast rate of acceleration is unreasonable and
7 unnecessary. The PPP can be replaced on a systematic basis over a longer time period so
8 that the capital expenditures in the test year are comparable to either the actual 2024 or the
9 forecast 2025 capital expenditures.¹⁹

10 Further, none of the capital expenditure categories that I previously listed are
11 correlated to customer growth, except to some extent the New Revenue Mains category.
12 Even if the growth in the New Revenue Mains category is assumed to be directly correlated
13 to customer growth, the Company’s forecast growth in that category in the test year exceeds
14 the Company’s forecast of combined customer and inflation growth by \$24.921 million.
15 The Company’s forecast capital expenditures in the other base rate categories that I
16 previously listed exceed its forecast of inflation growth by \$103.451 million.

17 Finally, as I noted in the summary section of my testimony, Emera has set target
18 capital expenditure levels that reflect the perpetuation of this unreasonable and excessive
19 “step-up” in the test year capital expenditures compared to prior years annually through

¹⁸ Schedule G-2, p 12a.

¹⁹ The forecast capital expenditures for the PPP category initially will be recovered in Rider CI/BSR, then rolled-in to the base revenue requirement in a subsequent base rate case. The Commission should consider the effect of this forecast growth in its overall assessment of the growth in forecast capital expenditures regardless of where the Company recovers the costs..

1 2029, which is even further cause for concern due to the fact that capital expenditures and
2 the effects on customer rates are cumulative and will drive the magnitude of future rate
3 increases through 2029.

4
5 **Q. WHY ISN'T THE GROWTH IN THE NEW REVENUE MAINS CATEGORY**
6 **NECESSARILY CORRELATED TO CUSTOMER GROWTH?**

7 A. Customer growth is already embedded into the historic actual capital expenditures. Unlike
8 growth in O&M expense arguably incurred to meet customer growth due to more
9 customers, capital expenditures incurred to meet customer growth are one-time capital
10 expenditures to provide service to the new customers, are not repeated for those new
11 customers once they become existing customers, and do not compound from one year to
12 the next. The capital expenditures in each year are not repeated in future years for the same
13 customers, so there is no incremental growth in capital expenditures year over year due to
14 customer growth unless the customer growth is greater in the test year than the customer
15 growth reflected on average in prior years.

16
17 **Q. WHAT ARE YOUR RECOMMENDATIONS?**

18 A. I recommend the Commission limit the growth in the 2026 capital expenditures for the
19 categories that I listed in the prior answer, except for the New Revenue Mains category, to
20 inflation growth because they are not correlated with customer growth.

21 I recommend the Commission limit the growth in the 2026 capital expenditures for
22 the New Revenue Mains category to the combined customer and inflation growth since

1 2024, even though I do not agree that customer growth is correlated in this case to the
2 growth in the capital expenditures in this category.²⁰

3 These adjustments are necessary to reduce the Company's unreasonable and
4 outsized forecast growth in capital expenditures to levels that reflect reasonable growth
5 consistent with the Company's forecast growth inflation and, to some extent, growth in
6 customers, in 2026 compared to 2024.

7 I note that my recommendations address only the Company's forecast capital
8 expenditures in 2026 even though the Company's forecast capital expenditures in 2025
9 also are excessive and unreasonable. However, I do not recommend disallowances of the
10 identified capital expenditures in 2025 because, as a practical matter, those specific
11 expenditures will have been incurred prior to the January 1, 2026 effective date of the
12 Commission's Order in this proceeding.²¹ The Company will not be able to reverse or
13 reduce those specific expenditures or the effects of those expenditures on rate base and the
14 capital related operating expenses on the revenue requirement for the test year.

15 To the extent the forecast capital expenditures in 2025 actually are incurred, the
16 expenditures and the related effects on the revenue requirement cannot be undone in the
17 absence of a Commission disallowance of costs already incurred. In contrast to the 2025
18 capital expenditures, the Commission can rein in the Company's forecast capital
19 expenditures in the test year and the Company can respond to the Commission's Order by

²⁰ I make this concession only to limit the potential areas of disagreement with the Company.

²¹ I use the terms identified and specific in this sentence because it is my recommendation that the Commission's prudence determination and spending approval should be based on actual projects and should not be based on a bucket of fungible dollars for which substitutions can be made to "meet" a Commission-established budget.

1 reducing its actual, as opposed to its “rate case,” capital expenditures budget before it
2 actually incurs those costs in 2026.

3
4 **Q. WHAT ARE THE EFFECTS OF YOUR RECOMMENDATIONS ON THE**
5 **COMPANY’S REQUESTED REVENUE INCREASE?**

6 A. The effect is a \$7.710 million reduction to the claimed base revenue requirement. This
7 amount is comprised of a \$5.989 million reduction in the return on rate base, based on a
8 reduction in rate base of \$63.332 million, and a \$1.721 million reduction in depreciation
9 expense after gross-up for Commission assessment fees and bad debt expense.

10
11 **D. The Company Assumed That Capital Expenditures Would Be Closed To Plant In**
12 **Service And Depreciated Earlier In The Test Year Than Its Actual Experience In**
13 **Prior Years**

14 **Q. DESCRIBE HOW CAPITAL EXPENDITURES ARE CLOSED TO PLANT IN**
15 **SERVICE AND COMPARE THE COMPANY’S ASSUMPTIONS FOR THE TEST**
16 **YEAR TO ITS ACTUAL EXPERIENCE IN PRIOR YEARS.**

17 A. Capital expenditures are recorded to CWIP. When the construction is completed, the costs
18 are “closed” by crediting CWIP and debiting gas plant in service. Once CWIP is closed to
19 gas plant in service, the Company begins to record depreciation expense.

20 The Company forecast the 13 month average of CWIP will be only \$36.165 million
21 in the test year based on its forecast of both capital expenditures and closings of CWIP to
22 plant in service during the test year. This forecast of CWIP is significantly less than the
23 actual 13 month averages of CWIP in each year 2020 through 2024, meaning the Company
24 has assumed that it will close CWIP at a faster rate during the test year than it has in any

1 of the five prior historic years. This assumption not only affects the Company's initial
2 revenue increase in 2026, but also affects the Company's proposed second year revenue
3 increase in 2027.

4 The average of \$36.165 million of CWIP in the test year is much less than any of
5 the actual amounts for the years 2020 through 2024, even though it has had significant
6 growth in its capital expenditures since 2020, including the forecast years 2025 and 2026.
7 More specifically, the Company had a 13 month average CWIP of \$120.248 million in
8 2020, \$148.987 million in 2021, \$195.972 million in 2022, \$256.977 million in 2023, and
9 \$101.150 million in 2024, an average of \$164.667 million each year over that five year
10 period. This inconsistency in the test year compared to prior years is compounded by the
11 fact the Company has significantly increased its actual capital expenditures over that five
12 year period and forecasts even further significant increases in capital expenditures in 2025
13 and 2026, as I previously described in the prior section of my testimony.

14
15 **Q. WHAT IS YOUR RECOMMENDATION?**

16 A. I recommend the Commission reject the Company's unreasonable assumption that it will
17 accelerate the pace of closings from CWIP to gas plant in service in the test year compared
18 to its actual experience in prior years and instead rely on the Company's actual experience
19 in such closings over the most recent actual five year period. This will result in a reduction
20 in gross plant and the related depreciation expense and accumulated depreciation and an
21 increase in CWIP by an amount equivalent to the reduction in gross plant.

22 **Q. WHAT ARE THE EFFECTS OF YOUR RECOMMENDATION?**

1 A. The effect is a \$3.283 million reduction to the claimed base revenue requirement. This
2 amount is comprised of a \$0.162 million increase in the return on rate base, based on an
3 increase in rate base of \$1.709 million, and a \$3.445 million reduction in depreciation
4 expense after gross-up for Commission assessment fees and bad debt expense. The effects
5 include a reduction in gross plant of \$128.501 million, a reduction in accumulated
6 depreciation of \$1.709 million, an increase in CWIP of \$128.501 million, and a reduction
7 in depreciation expense of \$3.418 million.

8
9 **E. The “Rate Case” O&M Expense Budget For The Test Year Was Developed**
10 **Specifically For This Rate Case And Reflects Excessive Costs**

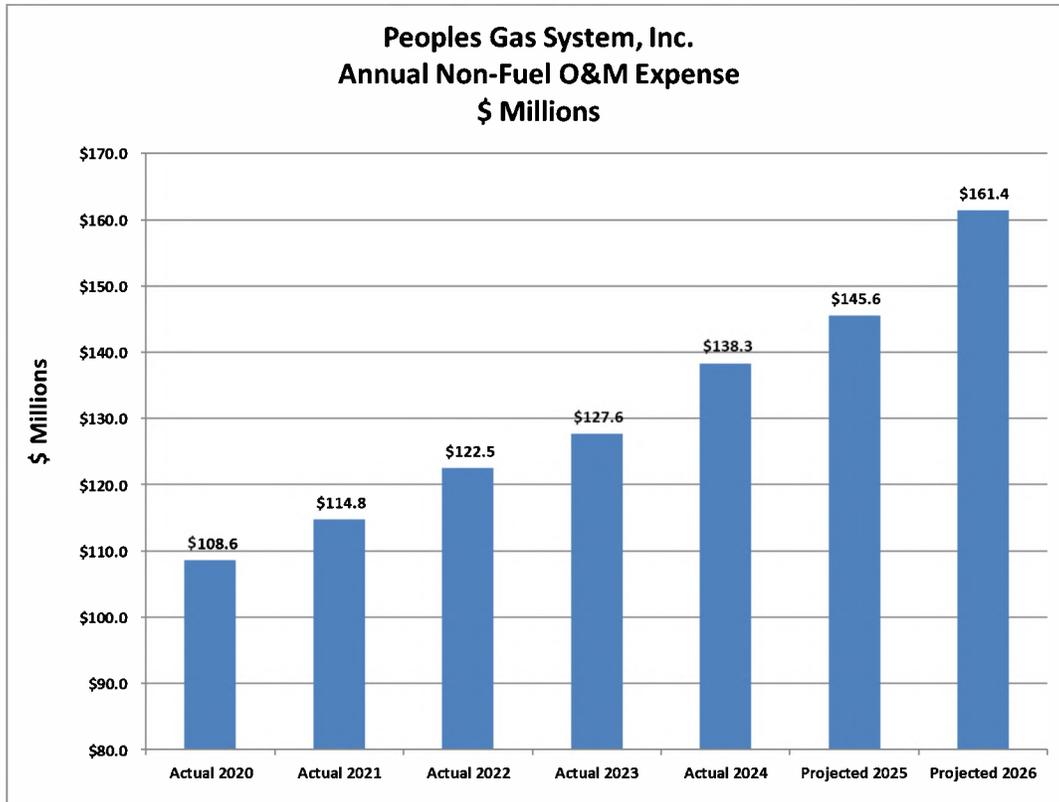
11 **Q. DESCRIBE THE O&M EXPENSE FORECAST BY PGS FOR THE TEST YEAR.**

12 A. PGS developed its “rate case” O&M expense budget for the 2026 test year starting in late
13 2024, the same timeline as the “rate case” capital expenditures budget for the test year.²²
14 PGS initially started with a combination of actual and budget O&M expenses for 2024 and
15 forecast O&M expenses for 2025 and 2026. The forecast O&M expense for the 2026 test
16 year follows a relentless historic pattern of significant annual growth, driven in large part
17 by annual increases in full time equivalent employees (team members).

18 The following graph shows the Company’s forecast growth in 2025 and 2026 O&M
19 expenses compared to actual O&M expenses from 2020 through 2024.²³

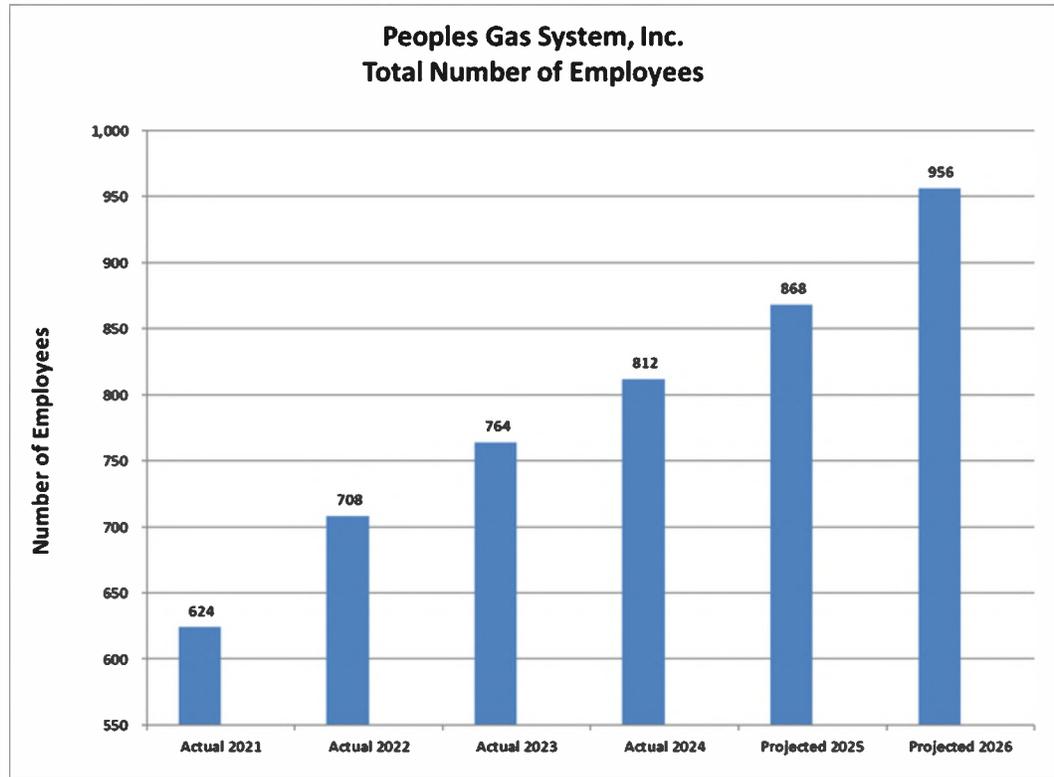
²² Response to Interrogatory No. 100 in OPC’s Second Set of Interrogatories. See Exhibit LK-3.

²³ Response to Interrogatory No. 133 in OPC’s Fourth Set of Interrogatories. I have attached a copy of this response as my Exhibit No. LK-4.



1 The following graph shows the Company’s forecast growth in team members in
 2 2025 and 2026 compared to actual team members from 2020 through 2024.²⁴

²⁴ Responses to Interrogatory No. 6 in OPC’s First Set of Interrogatories. I have attached a copy of this response as my Exhibit No. LK-5.



1 The Company’s calculations result in an increase in forecast O&M expense of \$7.3
2 million, or 5.3% in 2025, and another increase of \$15.8 million, or 10.9% in the test year
3 compared to 2025. In other words, the Company forecasts a cumulative increase in the test
4 year of \$23.1 million, or 16.7%, in the test year compared to the actual O&M expense in
5 2024.

6 In its calculations of the forecast O&M expense for the test year, the Company
7 increased certain expenses starting with actual 2024 expenses by trending them and then
8 added further increases in non-trended expenses.²⁵ For example, the Company trended
9 payroll expenses from 2024 (base year) to 2025 (base year + 1) and then trended the trended
10 expenses from 2025 to 2026.²⁶ It also added increases in non-trended payroll expenses in

²⁵ Schedule G-2 pages 12a-19g.

²⁶ *Id.*

1 both years to reflect forecast growth in team members during the first seven months of
2 2025 and additional forecast growth in team members during the test year, all on January
3 1, 2026, except for one team member it forecasts will be added in March .²⁷

4
5 **Q. WHAT IS THE PRIMARY DRIVER OF THE FORECAST GROWTH IN O&M**
6 **EXPENSE IN THE TEST YEAR COMPARED TO 2024?**

7 A. The primary driver is the Company's forecast growth of 144 team members by January 1,
8 2026, the first day of the test year, to 956 team members compared to the actual 812 team
9 members at December 31, 2024, which, already reflected growth of 188 team members
10 since the end of 2021. In other words, the Company forecasts growth of 144 team members,
11 or nearly 18%, in the twelve month period from December 31, 2024 to January 1, 2026.

12
13 **Q. IS THAT FORECAST GROWTH IN TEAM MEMBERS REASONABLE?**

14 A. No. It is excessive and unreasonable. The Company forecasts growth of nearly 18% in team
15 members in a single year. The sheer magnitude of this forecast growth and the timing
16 reflected in the "rate case" budgets are both unreasonable. Other rate regulated utilities
17 have been able to maintain or reduce the number of employee positions over time due to
18 rate base investments in technology and adoption of best practices.

19 Although the Company claims that its investments in technology, such as the Work
20 and Asset Management System (WAM), have enabled efficiencies and cost reductions,
21 there have been no savings in the number of team members and the payroll related costs.

²⁷ *Id.*

1 Instead, the Company has pursued relentless growth in the number of team members in its
2 “rate case” budgets and then added team members, albeit typically fewer than reflected in
3 its rate case budgets, funded by periodic rate case revenue increases authorized by the
4 Commission.

5 The Company also claims that it has in-sourced work activities by hiring additional
6 team members. Although the Company does perform limited formal analyses as to whether
7 in-sourcing will result in savings on an *ad hoc* basis, the Company does not routinely
8 perform any formal analysis to determine whether in-sourcing will result in savings and to
9 document the decision process reflected in its actual decisions or in the forecast additions
10 of team members. Nor does this in-sourcing appear to be a major factor in the growth in
11 team members. For example, in-sourcing meter reading work activities resulted in growth
12 of nine team members in 2025 and had no effect on the additional forecast growth in team
13 members in the test year.²⁸ Further, in my experience I have observed that other utilities
14 have found it more cost effective to utilize contractors for routine task oriented work
15 activities, contrary to the Company’s claims in support of in-sourcing in this proceeding.

16 The Company also claims the growth in team members is necessary due to customer
17 growth. Yet, the Company forecasts customer growth of 3.86% in 2025 and 3.58% in 2026,
18 well below the nearly 18% forecast team member growth from the end of 2024 to the
19 beginning of the test year. Further, not all work activities or functions are correlated
20 directly, or even indirectly, to the number of customers or even the growth in customers.
21 To the extent that work activities are customer facing, there may be some correlation to
22 growth in team members, but to the extent that work activities are not customer facing or

²⁸ Schedule G-2 at page 19d.

1 correlated to the number of customers, then customer growth does not justify additional
2 team members. Examples of the latter are the Company's executive management team
3 costs. There is only one President and Chief Executive Officer, one Vice President of
4 Finance,²⁹ one Vice President of Regulatory and External Affairs, one Vice President of
5 Safety, Operations, and Sustainability, one Vice President of Human Resources, and one
6 Vice President of Engineering, Construction, and Technology.

7 Further, the number of employees necessary for new construction does not increase
8 at the rate of growth each year. The Company already is staffed for continued growth in
9 customers and the related infrastructure. The employees devoted to new construction are
10 sufficient if growth remains relatively constant from year to year. Increases in employees
11 for new construction are necessary only if construction requirements due to growth
12 increase year over year. In other words, if growth in customers averages 4% each year,
13 then the existing employees devoted to new construction simply maintain that same level
14 of new construction year after year; no new employees are necessary unless growth
15 increases beyond the historic growth.

16
17 **Q. WHAT IS YOUR RECOMMENDATION?**

18 A. I recommend a reduction in the forecast growth in team members from the end of 2024
19 through the end of the test year from 144 to no more than 40 team members. This reflects
20 a starting point of the 812 team members at the end of 2024 and growth based on one half
21 of the Company's forecast growth in customers in 2025 and 2026 plus the Company's

²⁹ This position is currently vacant and being undertaken by the Vice President of Regulatory and External Affairs. No decision has been made to permanently fill the position.

1 addition of team members for the meter reading activity given that the Company reflected
2 the savings in contractor expense in the forecast O&M expense for the test year. I
3 recommend one half of the Company's forecast growth in customers to reflect the fact that
4 only a portion of the Company's work activities is directly or indirectly correlated to the
5 number of customers.

6 The forecast increase in employees and the forecast employees in the test year
7 compared to the base year and prior years are unreasonable and excessive. The increases
8 are predominantly discretionary and are not justified by business requirements. They are
9 not justified by customer growth. They are not justified by reductions in contractor
10 expenses. They do not reflect efficiencies from WAM or any other efficiencies. They do
11 not reflect the Company's historic vacancy experience where the actual employees are
12 significantly less than the budget employees.

13
14 **Q. DOES YOUR RECOMMENDATION RESULT IN A DISALLOWANCE OF**
15 **COSTS THAT ACTUALLY WILL BE INCURRED BY THE COMPANY?**

16 A. No. The Company will not incur the costs to add team members in 2026 before the
17 Commission issues an Order in this case, most likely in December of this year. The
18 Company will reflect the effects of the Commission Order in this case in its actual O&M
19 expense and capital expenditure budgets. In order to actually earn the return authorized in
20 this case, the Company will need to rein in its "rate case" forecast to only hire the number
21 of team members reflected in the revenue increased approved by the Commission. The
22 Company will hire fewer team members compared to its "rate case" expense and capital
23 expenditure budgets. This will be the practical effect of a Commission Order reducing the

1 forecast growth in O&M expense, capital expenditures, and team members. Hiring fewer
2 team members will reduce the actual O&M expense and the actual capital expenditures
3 spend rates in 2026 compared the “rate case” budgets, the same outcome in 2024 resulting
4 from the Commission Order in the prior rate case.

5
6 **Q. WHAT IS THE EFFECT OF YOUR RECOMMENDATION?**

7 A. The effect is a reduction in payroll expense, related payroll fringe adder expense, and
8 related payroll expense of \$6.028 million. I utilized an average payroll cost per team
9 member and an average payroll expense ratio for the purposes of this calculation. There is
10 a resulting reduction of \$6.075 million reduction in the base revenue requirement after
11 gross-up for Commission assessment fees and bad debt expense.

12
13 **OTHER FORECAST OPERATING EXPENSES ARE EXCESSIVE AND**
14 **UNREASONABLE; ADJUSTMENTS ARE NECESSARY**

15 **A. Company’s Forecast Reduction In Off-System Sales Net Revenues Is Unreasonable**
16 **Compared To Actual Net Revenues In Prior Years**

17 **Q. DESCRIBE THE COMPANY’S FORECAST OFF-SYSTEM SALES (OSS) NET**
18 **REVENUES IN THE TEST YEAR.**

19 A. The Company forecast OSS net revenues, or margins, of \$2.646 million in the 2026 test
20 year.³⁰ It is my understanding that the level of the Company’s OSS is dependent on the
21 availability of its open capacity and market pricing. The total forecast net revenues for
22 2026 is \$10.584 million, and the \$2.646 million represents the 25% that is currently

³⁰ Response to Interrogatory No. 109 in OPC’s Second Set of Interrogatories. I have attached a copy of this response as my Exhibit LK-6.

1 retained by the Company and reflected as an offset to base rates.³¹ The remaining 75% is
2 currently returned to customers as an offset in the Company’s Purchased Gas Adjustment
3 (PGA) clause.³² According to testimony, the Company projected these amounts based on
4 the “OSS net revenues achieved in 2023 of \$2.7 million and the \$2.5 million budgeted for
5 2024”.³³ It did not rely upon the actual 2024 level of OSS net revenues, stating that those
6 had increased significantly due to “favorable natural gas price spreads and higher market
7 demand conditions” and that it assumed for 2025 and 2026 budgeting purposes that
8 “market conditions will moderate relative to 2024.”³⁴

9
10 **Q. DESCRIBE THE LEVEL OF OSS NET REVENUES OVER THE LAST SEVERAL**
11 **YEARS AND BUDGETED FOR 2025 AND 2026.**

12 A. The Company’s actual OSS net revenues for the years 2022 through 2024 are shown in the
13 table below along with the amounts budgeted for 2025 and 2026. The data reflects for each
14 year the total net revenues along with the amount that is flowed through to customers in
15 the PGA clause and the amount that is retained by the Company.³⁵

³¹ Direct Testimony of Andrew Nichols at 67-69.

³² *Id.*

³³ *Id.*

³⁴ *Id.*

³⁵ Response to Interrogatory No. 109 in OPC’s Second Set of Interrogatories. See Exhibit LK-6.

	Total OSS Net Revenue	75% Offset To PGA Clause	25% Retained By Company
2022 Actual	\$17,840,585	\$13,380,440	\$ 4,460,146
2023 Actual	\$10,770,429	\$ 8,077,821	\$ 2,692,607
2024 Actual	\$19,353,496	\$14,515,122	\$ 4,838,374
2025 Forecast	\$10,428,550	\$ 7,821,412	\$ 2,607,137
2026 Forecast	\$10,583,550	\$ 7,937,663	\$ 2,645,888

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The actual data indicates that the \$2.693 million in OSS net revenues retained by the Company and applicable to base rates in 2023 appears to be the outlier as opposed to the 2024 level as described by the Company in testimony and noted above. This is even more apparent when considering the actual OSS net revenues experienced thus far in 2025. The Commission Staff (“Staff”) asked for the actual and projected OSS net revenues data to date in 2025 in a separate docket.³⁶ Below, I have replaced the 2025 actual and remaining forecast data from that response into the same data table presented above to show the adjusted forecast 2025 amounts to date.³⁷

³⁶ Response to Staff Request No. 2 in Staff’s Second Data Request in Docket No. 202500026-GU. I have attached a copy of that response as my Exhibit LK-7.

³⁷ *Id.*

	Total OSS Net Revenue	75% Offset To PGA Clause	25% Retained By Company
2022 Actual	\$17,840,585	\$13,380,440	\$ 4,460,146
2023 Actual	\$10,770,429	\$ 8,077,821	\$ 2,692,607
2024 Actual	\$19,353,496	\$14,515,122	\$ 4,838,374
2025 Actual Jan-Apr	\$11,542,416	\$ 8,656,812	\$ 2,885,604
2025 Forecast May-Dec	\$ 6,918,372	\$ 5,188,779	\$ 1,729,593
2025 Total Actual/Forecast	\$18,460,788	\$13,845,591	\$ 4,615,197
2026 Forecast	\$10,583,550	\$ 7,937,663	\$ 2,645,888
Average 2022,2023,2024, and 2025 Retained By Company			\$ 4,151,581

1 The actual 25% amount of OSS net revenues retained by the Company during the
2 first four months of 2025 is more than the Company’s budget for the entirety of 2025 and
3 the “rate case” budget for 2026. The adjusted 2025 forecast amount is very similar to the
4 amounts experienced in 2022 and 2024, and much higher than the amount experienced in
5 2023. The average OSS net revenues for the years 2022 through 2025 retained by the
6 Company is \$4.152 million, which is \$1.506 million more than the Company’s “rate case”
7 budget for 2026.

8

9 **Q. WHAT IS YOUR RECOMMENDATION?**

10 A. I recommend that the Commission increase the level of OSS net revenues retained by the
11 Company and included in base rates to reflect the four-year average of \$4.152 million as

1 reflected above. This amount is based upon the 25% portion of such revenues that is
2 currently retained by the Company.

3
4 **Q. WHAT IS THE EFFECT OF YOUR RECOMMENDATION?**

5 A. The effect is a \$1.506 million increase in OSS net revenues and a \$1.518 million reduction
6 in the base revenue requirement after gross-up for Commission assessment fees and bad
7 debt expense.

8
9 **B. Increase Off-System Sales Net Revenues To Reflect PGS Request For 50/50 Sharing**

10 **Q. DESCRIBE THE COMPANY'S REQUEST TO MODIFY THE LEVEL OF**
11 **SHARING ASSOCIATED WITH THE OSS SALES.**

12 A. The Company requested in Docket No. 20250026-GU among other things that it be
13 allowed to share on a 50/50 basis the OSS net revenues on a going-forward basis. The
14 Company's petition in that docket was made on January 13, 2025 and is still pending. PGS
15 testimony in this proceeding indicates that the claimed revenue requirement and requested
16 revenue increase should be reduced by \$2.646 million if the Commission authorizes the
17 Company's request in Docket No. 20250026-GU.³⁸ That amount is based on the
18 Company's forecast OSS net revenues for the test year and increasing the present 25%
19 sharing level to a 50% sharing level. The reflection of such a reduction in base rates is
20 appropriate since the PGA clause rates would increase due to the percentage sharing
21 change, all else equal.

³⁸ Direct Testimony of Andrew Nichols at 69.

1 **Q. WHAT IS YOUR RECOMMENDATION?**

2 A. I recommend that the Commission increase the level of OSS net revenues retained by the
3 Company and included in base rates if it authorizes the Company's request in Docket No.
4 20250026-GU to modify the level of sharing. If the Commission denies the Company's
5 request to change the sharing percentages, then no further adjustment in this proceeding
6 would be necessary.

7

8 **Q. WHAT IS THE EFFECT OF YOUR RECOMMENDATION?**

9 A. The effect is a \$4.152 million increase in OSS net revenues and a \$4.184 million reduction
10 in the base revenue requirement after gross-up for Commission assessment fees and bad
11 debt expense.

12

13 **C. Property Tax Expense Is Excessive**

14 **Q. DESCRIBE THE COMPANY'S FORECAST PROPERTY TAX EXPENSE IN THE**
15 **TEST YEAR AND COMPARE IT TO THE PROPERTY TAX EXPENSE IN THE**
16 **BASE YEAR.**

17 A. The Company's forecast property tax expense in the test year is \$29.324 million, an
18 increase of \$7.429 million, or 33.9% over the actual property tax expense of \$21.895
19 million in the base year.³⁹ The valuation date is January 1 for each year for personal and
20 real property that is in-service on that date. CWIP is not subject to property tax. The

³⁹ Response to Interrogatory No. 60 in OPC's First Set of Interrogatories. I have attached a copy of this response as my Exhibit LK-8.

1 Company provided its calculation of the property tax expense for the test year in response
2 to OPC discovery.⁴⁰

3
4 **Q. DESCRIBE THE COMPANY’S CALCULATION OF THE PROPERTY TAX**
5 **EXPENSE ON TANGIBLE PERSONAL PROPERTY FOR THE TEST YEAR.**

6 A. The Company is taxed based on its tangible personal property (TPP) and real property
7 valuations at January 1 each year. The largest of the two valuations is the TPP, which
8 comprises approximately 95% of the total property valuation and is taxed at a higher rate
9 than the real property. The Company developed the \$1,824.466 million TPP valuation at
10 January 1, 2026 for the test year using the weighted results of a cost-based approach (net
11 book value) and an income approach (recent net operating income (NOI) divided by the
12 cost of capital). The net book value receives a weighting of 20% and the income approach
13 receives a weighting of 80%. The income approach used by the Company to project test
14 year expense relied upon actual and forecast NOI for 2023, 2024, and 2025 and weighted
15 the most current years’ data higher than that for the previous years. The Company’s 2026
16 appraisal NOI estimate is duplicated below:⁴¹

⁴⁰ Response to POD No. 7 in OPC’s First Set of Production of Documents. The applicable file name is (BS 2233)1_15_25 2026 Budget PGS PROP TAX APPRAISAL using 12+0 SOP. I have attached a copy of the narrative portion of this response and the worksheet tabs Inc Approach and CountyDetailEstimate as my Exhibit LK-9. The final property tax expense estimate calculation amount is reflected in Cell Q3 of worksheet tab CountyDetailEstimate.

⁴¹ *Id.*

Peoples Gas System 2026 Property Tax Budget Appraisal
Income Approach to Value - As Filed by PGS
Determine 2026 Net Operating Income to Capitalize

<u>Year</u>	<u>NOI As Booked</u>	<u>Weight</u>	<u>Weighted NOI</u>	
2023 Actual	\$118,841,878	1	\$19,806,980	
2024 Forecast	\$169,027,750	2	\$56,342,583	
2025 Forecast	\$172,037,106	3	\$86,018,553	
			<u>Weighted Average</u>	<u>Use</u>
			\$162,168,116	\$162,200,000

1 The Company’s 2026 estimate relied upon an old forecast NOI amount for 2024 of
2 \$169.028 million instead of the actual amount of \$168.827 million. It also included an old
3 forecast NOI amount for 2025 of \$172.037 million instead of an updated amount based on
4 the NOI forecast for 2025 in the instant filing of \$157.386 million.⁴²

5
6 **Q. HAVE YOU RECALCULATED THE FORECAST PROPERTY TAX EXPENSE**
7 **TO ACCOUNT FOR THE UPDATED NOI AMOUNTS APPLICABLE TO 2024**
8 **AND 2025?**

9 A. Yes. I inserted the actual 2024 NOI and the projected 2025 NOI from the Company’s filing
10 from Schedule G-2 into the Company’s valuation model. The resulting 2026 appraisal
11 NOI estimate by utilizing more current data is duplicated below:

⁴² The 2024 actual NOI and the 2025 projected NOI are both reflected in the application at Schedule G-2 at line 17.

Peoples Gas System 2026 Property Tax Budget Appraisal
Income Approach to Value - As Adjusted by OPC
Determine 2026 Net Operating Income to Capitalize

<u>Year</u>	<u>NOI As Booked</u>	<u>Weight</u>	<u>Weighted NOI</u>	
2023 Actual	\$118,841,878	1	\$19,806,980	
2024 Actual	\$168,827,176	2	\$56,275,725	
2025 Forecast	\$157,385,906	3	\$78,692,953	
			<u>Weighted Average</u>	<u>Use</u>
			\$154,775,658	\$154,800,000

1 I rounded the weighted average result to the nearest hundred thousand dollars just
2 like the Company did, utilizing \$154.800 million. With no other changes made to the
3 Company’s 2026 property tax expense model, the property tax expense generated from this
4 change is \$28.546 million, resulting in a reduction from the as-filed amount of \$0.777
5 million.

7 **Q. WHAT IS YOUR RECOMMENDATION?**

8 A. I recommend the Commission reduce the projected amount of property tax expense for the
9 test year to properly reflect updated NOI amounts in the asset valuation process. This
10 appears to have been an oversight by the Company. These amounts were updated
11 appropriately in the property tax expense forecast for the 2027 SYA.

1 **Q. WHAT IS THE EFFECT OF YOUR RECOMMENDATION?**

2 A. The effect is a \$0.777 million reduction in property tax expense and a \$0.783 million
3 reduction in the base revenue requirement after gross-up for Commission assessment fees
4 and bad debt expense.

5
6 **D. Supplemental Executive Retirement Plan Expense Was Disallowed In Recent Tampa**
7 **Electric Company Rate Case**

8 **Q. DESCRIBE THE COMPANY’S REQUEST TO INCLUDE SUPPLEMENTAL**
9 **EXECUTIVE RETIREMENT PLAN (“SERP”) EXPENSE IN THE BASE**
10 **REVENUE REQUIREMENT.**

11 A. The Company requests recovery of \$0.124 million in SERP expense in the base revenue
12 requirement.⁴³ These expenses are incurred to provide certain highly compensated
13 executives retirement benefits in addition to the benefits otherwise available through the
14 Company’s pension and OPEB plans. These are considered to be non-qualified plans
15 because the additional compensation exceeds deductible compensation limits set forth in
16 the Internal Revenue Code.

17
18 **Q. WHAT IS YOUR RECOMMENDATION?**

19 A. I recommend the Commission deny the Company’s request to recover this expense. The
20 SERP expense is discretionary. It is incurred to attract, retain, and reward highly
21 compensated employees whose interests are more closely aligned with those of the

⁴³ Responses to Interrogatory No. 30 and 38 in OPC’s First Set of Interrogatories. I have attached a copy of these responses as my Exhibit LK-10.

1 Company's shareholders rather than its customers. The expense is not necessary to provide
2 regulated utility service and it is not reasonable to impose the expense on utility customers.
3 SERP expense recovery was recently denied by the Commission in the last Tampa Electric
4 Company base rate proceeding.⁴⁴
5

6 **Q. WHAT IS THE EFFECT OF YOUR RECOMMENDATION?**

7 A. The effect is a reduction of \$0.124 million in SERP expense and \$0.125 million in the
8 claimed revenue requirement and requested base rate increase after gross up for bad debt
9 and Commission fees.
10

11 **E. Reduce Board of Directors' Expense to Reflect Correction of Filing Error**

12 **Q. DID THE COMPANY DETERMINE THAT IT MADE AN ERROR IN THE**
13 **AMOUNT OF BOARD OF DIRECTORS'S FEES INCLUDED IN THE BASE**
14 **REVENUE REQUIREMENT?**

15 A. Yes. The Company included in the originally filed revenue requirement \$0.137 million for
16 compensation of PGS's Board of Directors and another \$0.200 million in such expense
17 allocated to it by the parent company Emera.⁴⁵ When responding to discovery, the
18 Company determined that the amount allocated to it by Emera should have been \$0.095
19 million, a reduction in the forecast expense of \$0.105 million.⁴⁶ The Company also stated

⁴⁴ Order No. PSC-2025-0038-FOF-EI, issued February 3, 2025, Docket No. 20240026-EI, In re: Petition for rate increase by Tampa Electric Company, at 106-107.

⁴⁵ Response to Interrogatory No. 26 in OPC's First Set of Interrogatories. I have attached a copy of this response as my Exhibit LK-11.

⁴⁶ *Id.*

1 in the same response that it planned to “adjust the test year revenue requirement calculation
2 to correct this error.”⁴⁷
3

4 **Q. WHAT IS YOUR RECOMMENDATION?**

5 A. I recommend that the Commission correct the revenue requirement to account for the
6 Company’s filing error correction.
7

8 **Q. WHAT IS THE EFFECT OF YOUR RECOMMENDATION?**

9 A. The effect is a reduction of \$0.105 million in Board of Director’s expense and \$0.106
10 million in the claimed revenue requirement and requested base rate increase after gross up
11 for bad debt and Commission fees.
12

13 **F. Reduce Directors and Officers Insurance Expense, Investor Relations Expense, and**
14 **Board of Directors’ Expense to Reflect Sharing Between Company’s Shareholders**
15 **and Customers**

16 **Q. DESCRIBE THE THREE CORPORATE RELATED EXPENSES THE COMPANY**
17 **INCLUDED IN THE REVENUE REQUIREMENT IN THIS PROCEEDING.**

18 A. The Company included expenses related to its parent company, Emera, and its own
19 corporate governance in the revenue requirement. Emera’s stock and other securities are
20 publicly traded. Emera incurs certain governance expenses and liability insurance
21 expenses related to its directors and officers and charges those expenses to PGS and other
22 Emera affiliates. PGS also incurs certain governance expenses related to its own directors

⁴⁷ *Id.*

1 and officers.

2 The Company incurred Directors & Officers (“D&O”) liability insurance expense
3 of \$0.073 million during the test year.⁴⁸ D&O insurance is designed to protect the
4 individual directors and officers of an organization from personal liability and potential
5 losses arising from their service and decisions made while serving in those roles. D&O
6 insurance also may defray the legal and other costs incurred to defend against corporate
7 liability and potential losses related arising from decisions made by directors and officers
8 on behalf of an organization.

9 In addition, Emera maintains an investor relations organization to interact with
10 present and potential investors. Emera allocated expenses of \$0.041 million to PGS related
11 to this organization during the test year.⁴⁹ The Emera website details the communications
12 supplied to investors.⁵⁰ The communications include such things as news releases, investor
13 presentations, regulatory filings, analyst reports, and other statistical and reporting
14 information.

15 Finally, the Company included Board of Directors expenses of \$0.232 million
16 during the test year, consisting of expenses the Company incurred directly and expenses
17 incurred by Emera and charged to the Company.⁵¹

⁴⁸ Response to Interrogatory No. 115 in OPC’s Second Set of Interrogatories, a copy of which I have attached as my Exhibit LK-12.

⁴⁹ Response to Interrogatory No. 117 in OPC’s Second Set of Interrogatories, a copy of which I have attached as my Exhibit LK-13.

⁵⁰ [Home](#) | [Emera. Corporate Profile](#) | [Emera](#)

⁵¹ Response to Interrogatory No. 116 in OPC’s Second Set of Interrogatories, a copy of which I have attached as my Exhibit LK-14. This amount is net of the \$0.105 million error correction noted in the subsection above.

1 **Q. SHOULD THERE BE A SHARING OF THESE KINDS OF CORPORATE**
2 **EXPENSES BETWEEN CUSTOMERS AND SHAREHOLDERS?**

3 A. Yes. the benefits from such activities inure primarily to shareholders, not to customers.
4

5 **Q. HAS THE COMMISSION PREVIOUSLY RULED ON THE SHARING OF THESE**
6 **KINDS OF EXPENSES?**

7 A. Yes. The Commission determined there should be an equal sharing of D&O insurance
8 expense costs between customers and shareholders in at least three prior rate cases, one for
9 Tampa Electric Company, one for Gulf Power Company, and the other for Progress Energy
10 Florida.⁵²
11

12 **Q. WHAT IS YOUR RECOMMENDATION?**

13 A. I recommend an equal sharing of the Company's D&O insurance and Board of Directors
14 expenses between customers and shareholders to allocate these expenses equally based on
15 an assumption the expenses benefit both ratepayers and shareholders, as recognized in prior
16 Commission Orders.
17

18 **Q. WHAT ARE THE EFFECTS OF YOUR RECOMMENDATION?**

19 A. The effects are a reduction of \$0.037 million in D&O insurance expense and the revenue
20 requirement, a reduction of \$0.021 million in investor relations expense and the revenue

⁵² Order No. PSC-2025-0038-FOF-EI, issued February 3, 2025, Docket No. 20240026-EI, In re: Petition for rate increase by Tampa Electric Company, at p. 112; Order No. PSC-2012-0179-FOF-EI, issued April 3, 2012, Docket No. 20110138-EI, In re: Petition for increase by Gulf Power Company, at p. 101; Order No. PSC-2010-0131-FOF-EI, issued March 5, 2010, in Docket No. 20090079-EI, In re: Petition for increase in rates by Progress Energy Florida, Inc. at p. 99.

1 requirement, and a reduction of \$0.116 million in Board of Directors expenses and a
2 reduction of \$0.117 million in the revenue requirement after the gross-up for bad debt and
3 Commission fees.
4

5 **G. Reduce WAM Depreciation Expense To Reflect Company's Proposal To Extend**
6 **Amortization Period From 15 Years To 20 Years**

7 **Q. DESCRIBE THE COMPANY'S PROPOSAL TO REDUCE WAM**
8 **DEPRECIATION EXPENSE TO EXTEND THE AMORTIZATION PERIOD.**

9 A. The Company proposes to create a new FERC plant subaccount 303.02 for the WAM
10 intangible plant costs and to reduce the WAM depreciation expense by extending the
11 amortization period from 15 years to 20 years and adopted a 5.0% depreciation rate
12 effective January 1, 2026.⁵³
13

14 **Q. DID THE COMPANY REFLECT THIS PROPOSAL IN THE TEST YEAR**
15 **REVENUE REQUIREMENT?**
16

17 A. No.⁵⁴
18

19 **Q. DO YOU AGREE WITH THE COMPANY'S PROPOSAL?**

20 A. Yes.
21

⁵³ Petition at 31-33.

⁵⁴ *Id.*, 32.

1 **Q. WHAT IS THE EFFECT OF THE COMPANY’S PROPOSAL?**

2 A. The effect is a reduction in the requested base revenue increase of \$0.689 million,
3 consisting of a reduction of \$0.718 million in depreciation expense (reduction in revenue
4 requirement of \$0.723 million) offset by the grossed up return on the reduction in
5 accumulated depreciation included rate base of \$0.034 million.⁵⁵

6

7 **H. Increase Parent Debt Tax Adjustment To Reflect Tampa Electric Company Rate**
8 **Case Orders**

9 **Q. DESCRIBE THE COMPANY’S CALCULATION OF THE PARENT DEBT TAX**
10 **ADJUSTMENT.**

11 A. Company witness Nichols generally describes the company’s calculation in direct
12 testimony. The Company’s calculation is shown on Schedule C-26. The Company
13 calculated the adjustment based on Emera’s weighted debt ratio times Emera’s average
14 cost of debt times the Company’s adjusted common equity excluding retained earnings of
15 \$1,332.6 million (\$1,421.0 million adjusted common equity as shown on Schedule G-3 less
16 retained earnings of \$88.4 million as shown on Schedule G-1 page 8 line 2). The footnote
17 on Schedule C-26 states that the common equity “excludes retained earnings in accordance
18 with Rule 25-14.004(4).

⁵⁵ Response to Interrogatory No. 112 in OPC’s Second Set of Interrogatories. I have attached as my Exhibit LK-12I have attached a copy of this response as Exhibit LK-15.

1 **Q IS THE COMPANY’S CALCULATION CONSISTENT WITH THE**
2 **COMMISSION’S CALCULATION OF THE PARENT DEBT ADJUSTMENT FOR**
3 **TAMPA ELECTRIC COMPANY?**

4 A. No. The Commission’s calculation of the parent debt adjustment for Tampa Electric
5 Company in its recent rate case, Docket 20240026-EI, reflects no reduction in adjusted
6 common equity to exclude retained earnings. Tampa Electric Company calculated the
7 adjustment excluding retained earnings in its claimed revenue requirement in that case,
8 despite prior Commission Orders in which the Commission included retained earnings.
9 The Commission revised Tampa Electric Company’s calculation to include retained
10 earnings to reflect the methodology adopted by the Commission in a 2009 Tampa Electric
11 Company rate case, Docket No. 20080317-EI and affirmed in subsequent Tampa Electric
12 Company rate cases.

13 In the 2009 rate case, Tampa Electric Company opposed any parent debt
14 adjustment, despite the requirement for such an adjustment in Rule 25-14.004, F.A.C. In
15 the 2009 case, the Commission rejected Tampa Electric Company’s arguments and found
16 that a parent debt adjustment was required. The Company also argued that the adjusted
17 common equity was overstated because “TECO Energy’s policy requires subsidiaries to
18 pay dividends equal to all of their net income to the parent.”⁵⁶ The Commission also
19 rejected that argument and found that the adjusted Tampa Electric Company common
20 equity should be used for the calculation.

21

⁵⁶ Order in Docket No. 20080317-EI at 77, reciting Tampa Electric Company Witness Gillette’s testimony opposing the parent debt adjustment.

1 **Q. SHOULD PGS BE TREATED THE SAME AS TAMPA ELECTRIC COMPANY?**

2 A. Yes. Until the 2023 Transaction whereby PGS was spun out of Tampa Electric Company
3 as a separate legal entity, PGS did not have its own financing or capital structure; it was
4 the same as Tampa Electric Company's. Now that PGS is a separate legal entity, there is
5 no evident reason why PGS should be treated any differently than Tampa Electric
6 Company in the calculation of the parent debt adjustment.

7

8 **Q. WHAT IS YOUR RECOMMENDATION?**

9 A. I recommend the Commission calculate the parent debt adjustment the same way for PGS
10 as it has for Tampa Electric Company since the 2009 rate case

11

12 **Q. WHAT IS THE EFFECT OF YOUR RECOMMENDATION?**

13 A. The effect is a reduction in tax expense of \$0.197 million and a reduction in the base
14 revenue requirement of \$0.266 million.

15

16 **IV. QUANTIFICATION OF ADJUSTMENTS TO REFLECT OPC WITNESS**
17 **GARRETT'S RECOMMENDED CAPITAL STRUCTURE AND COST OF**
18 **EQUITY**

19 A. **Quantification of Adjustment To Reflect Mr. Garrett's Capital Structure**
20 **Recommendation**

21 **Q. HAVE YOU QUANTIFIED THE EFFECTS OF MR. GARRETT'S CAPITAL**
22 **STRUCTURE RECOMMENDATION?**

23 A. Yes. The effect is a \$13.709 million reduction in the base revenue requirement.

24 B. **Quantification of Adjustment To Reflect Mr. Garrett's Return On Equity**
25 **Recommendation**

1 **Q. HAVE YOU QUANTIFIED THE EFFECT OF MR. GARRETT’S RETURN ON**
2 **EQUITY RECOMMENDATION?**

3 A. Yes. The effect of Mr. Garrett’s return on equity recommendation is a \$35.154 million
4 reduction in the Company’s base revenue requirement and requested base rate increase.
5 This amount is incremental to the reductions in the revenue requirement that I quantified
6 for Mr. Garrett’s recommendations to modify the capital structure.

7
8 **Q. HAVE YOU QUANTIFIED THE EFFECTS OF A 10 BASIS POINT CHANGE IN**
9 **THE RETURN ON COMMON EQUITY?**

10 A. Yes. Each 10 basis point change in the return on equity equals \$1.758 million in the base
11 revenue requirement and requested base rate increase. This is based on an equity ratio of
12 49.0% on a financial basis and 43.07% on a regulatory basis.

13
14 **C. Summary Of Cost Of Capital Based on OPC Recommendations Compared To The**
15 **Company’s Proposals**

16 **Q. SUMMARIZE THE COST OF CAPITAL BASED ON THE OPC**
17 **RECOMMENDATIONS COMPARED TO THE COMPANY’S PROPOSALS.**

18 A. The following table compares the OPC recommendations to the Company’s proposed
19 capital structure and cost of capital recommendations before income tax and after income
20 tax gross-ups.

**PEOPLES GAS SYSTEM, INC.
COST OF CAPITAL
DOCKET NO. 20250029-GU**

PGS Cost of Capital Per Filing

	Jurisdictional Adjusted Capital \$ Millions	Capital Ratio	Component Costs	Weighted Avg Cost	Grossed-Up WACC
Long Term Debt	1,082.596	36.64%	5.64%	2.07%	2.09%
Short Term Debt	93.604	3.17%	4.24%	0.13%	0.13%
Customer Deposits	29.475	1.00%	2.52%	0.03%	0.03%
Deferred Income Tax	327.784	11.09%	0.00%	0.00%	0.00%
Investment Tax Credits	-	0.00%	0.00%	0.00%	0.00%
Common Equity	1,420.982	48.10%	11.10%	5.34%	7.21%
Total Capital	2,954.442	100.00%		7.57%	9.46%

PGS Cost of Capital Recommended by OPC

	Jurisdictional Adjusted Capital \$ Millions	Capital Ratio	Component Costs	Weighted Avg Cost	Grossed-Up WACC
Long Term Debt	1,230.959	41.66%	5.64%	2.35%	2.37%
Short Term Debt	93.604	3.17%	4.24%	0.13%	0.13%
Customer Deposits	29.475	1.00%	2.52%	0.03%	0.03%
Deferred Income Tax	327.784	11.09%	0.00%	0.00%	0.00%
Investment Tax Credits	-	0.00%	0.00%	0.00%	0.00%
Common Equity	1,272.619	43.07%	9.00%	3.88%	5.24%
Total Capital	2,954.442	100.00%		6.39%	7.77%

1 **V. COMPANY’S PROPOSED SECOND YEAR BASE REVENUE INCREASE**
2 **(SUBSEQUENT YEAR ADJUSTMENT) IS UNREASONABLE AND FAILS TO**
3 **CONSIDER ANNUALIZATIONS OF TEST YEAR REVENUES AND COST**
4 **REDUCTIONS**
5

6 **Q. DESCRIBE THE COMPANY PROPOSED SECOND YEAR BASE REVENUE**
7 **INCREASE.**

8 A. The Company proposes a second year base revenue requirement that aggressively attempts
9 to annualize all plant-related costs included in the initial base revenue requirement, but
10 does so selectively and without consideration of revenue increases and plant-related cost
11 reductions that that will reduce the proposed increase. The Company’s calculation also
12 includes a significant error that overstates the requested revenue increase.

13 The Company’s Petition states:⁵⁷

14 The company requests that the Commission approve a subsequent year adjustment
15 of \$26,709,027 million effective with the first billing cycle in January 2027. This
16 amount reflects the incremental revenue requirement that would result from
17 recalculating the company’s 2026 revenue requirement using its projected net
18 utility plant balances as of December 31, 2026 (“2026 year-end rate base”),
19 recognizing a full year of depreciation and property tax expenses for the utility plant
20 included in 2026 year-end rate base, and its proposed overall rate of return for 2026,
21 i.e., 7.57 percent.

22 Company witness Jeff Chronister provides a more detailed description of the
23 calculation of the second year base revenue increase in direct testimony as follows.

24 The company’s proposed 2027 SYA revenue requirement amount includes the
25 following three components: (1) the additional return using Commission approved
26 cost of capital on the difference between 2026 year-end Net Utility Plant and the
27 2026 13-month average Net Utility Plant amount; (2) the additional depreciation
28 expense based on 2026 year-end Plant In Service balance as compared to the 2026
29 test year depreciation expense that is calculated using month end balances during
30 the 2026 test year; (3) the additional property tax expense in 2027 determined using
31 December year-end 2026 Net Utility Plant and 2026 NOI as compared to the 2026

⁵⁷ Petition at paragraph 28, page 10.

1 test year Commission approved property tax expense that is determined using
2 December 2025 Net Utility Plant and 2025 NOI.⁵⁸
3

4 **Q. SHOULD THE COMMISSION APPROVE THE COMPANY’S SECOND YEAR**
5 **BASE REVENUE INCREASE?**

6 A. No. The Company’s request is an aggressive attempt to expand further the successful initial
7 attempt by Tampa Electric Company to annualize specific test year costs into the year
8 following the test year in Docket No. 20230026-EI to include *all* plant related costs at the
9 end of the test year. In other words, *all* “business as normal” plant related costs. In the
10 Tampa Electric Company case, the Commission went beyond its historic practice of
11 annualizing the effects of new generation in the test year and in the year after the test year
12 to include certain identifiable “business as normal” grid reliability and resilience
13 improvements. At least there was the pretense in that case that grid reliability and resilience
14 and resilience improvements were somehow unique costs with characteristics similar to
15 new generation. In this case, there is no such pretense, just an aggressive attempt to
16 annualize *all* plant related costs forecast in the test year carried into 2027, something that
17 OPC warned likely would occur if the Commission approved Tampa Electric Company’s
18 request to include “business as normal” grid reliability and resilience improvements.

19 Now the Commission is faced with another attempted expansion to annualize *all*
20 plant related costs forecast in the test year carried into 2027. If the Commission approves
21 this request, then all other utilities likely will follow this precedent. As OPC noted in the
22 Tampa Electric Company case, these are significant and precedential decisions made for

⁵⁸ Direct Testimony of Jeff Chronister at 39.

1 an individual utility, but with statewide consequences, decisions made without a
2 rulemaking and without full consideration of the consequences, including the parameters
3 and methodologies to be used for such second year base revenue increases.

4 If, however, the Commission proceeds to approve the Company's request in this
5 proceeding, then it at least should address the numerous error and methodological problems
6 with the Company's calculations, all of which bias the request upward. The requests fails
7 to reflect any benefit of revenue increases due to the annualization of customer growth at
8 the end of the test year carried into 2027 and fails to reflect cost reductions from the
9 annualization of plant related costs at the end of the test year carried into 2027. Correction
10 of an error and changes in the methodology for the second year revenue increases are
11 necessary to match all elements of such an incremental approach that affect the second year
12 revenue requirement in the absence of a comprehensive approach, instead of the biased
13 selection of cost increases proposed by the Company. Again, the Commission's decision
14 in this case will set the precedent for the other utilities in the state going forward. The
15 Commission should make an informed and balanced decision that considers customer
16 interests rather than one that is focused exclusively on the utility's interests.

17
18 **Q. ADDRESS THE COMPANY'S FAILURE TO REFLECT THE ANNUALIZATION**
19 **OF REVENUES AND PLANT-RELATED COST REDUCTIONS.**

20 A. The Company failed to annualize revenues for customer growth through the end of the test
21 year. The Company attempts to justify the use of year end plant because the test year plant
22 related costs included in rate base were calculated on a 13 month average basis, not at the
23 end of the test year, and the depreciation expense and property tax expense were calculated

1 on plant costs throughout the test year, not at the end of the test year. Yet, the base revenues
2 in the test year were calculated based on customers throughout the test year, not at the end
3 of the test year. If costs are to be annualized at the end of the test year, then revenues also
4 should be annualized based on the number of customers at the end of the test year. That
5 customer growth and the related revenues will carry over into 2027, the same as the
6 depreciation and property tax expense based on plant related costs and other calculation
7 parameters at the end of the test year.

8 The Company also failed to reflect the growth in accumulated depreciation on the
9 annualized plant at the end of the test year that will continue into 2027, instead reflecting
10 only the increase accumulated depreciation on the increase in the plant at year end
11 compared to the 13 month average in the test year. This is an outright error given that the
12 Company will recover the return on the entire gross plant as of the end of the test year in
13 2027, but will not reflect the offset for the increase in accumulated depreciation in 2027,
14 except for the amount due to the increase in plant.

15 The Company also failed to reflect all plant-related cost reductions at the end of the
16 test year. More specifically, it failed to increase the accumulated deferred income taxes
17 (ADIT) compared to the 13 month average used in the calculation of the cost of capital.
18 Yet, the ADIT will carry over into 2027, the same as the other plant-related costs will carry
19 over into 2027. The annualization of the increase in ADIT at the end of the test year and in
20 2027 would reduce the cost of capital and the base revenue requirement on the plant related
21 costs at the end of the test year.⁵⁹

⁵⁹ Response to Interrogatory No. 98 in OPC's Second Set of Interrogatories.

1 **Q. DESCRIBE THE GROWTH IN CUSTOMERS THROUGHOUT THE TEST YEAR**
2 **TO TEST YEAR END AND THE EFFECT ON BASE REVENUES IF THAT**
3 **GROWTH IS ANNUALIZED AND PROPERLY CARRIED FORWARD INTO**
4 **2027.**

5 A. The Company forecasts 546,510 customers at the end of the test year, an increase of 9,176
6 customers over the average for the test year used on a monthly basis to calculate the present
7 base revenues and to calculate the initial requested base revenue increase. Using the
8 increase in customers at the end of the test year compared to the average to calculate this
9 annualization effect carried into 2027 is the same methodology used by the Company to
10 annualize the depreciation expense and property tax expense based on plant costs at the
11 end of the test year carried into 2027.

12

13 **Q. WHAT IS YOUR RECOMMENDATION?**

14 A. If the Commission approves the Company's request to annualize *all* plant related costs,
15 then I recommend the Commission also annualize the base revenues using the end of test
16 year customers. This is necessary to ensure some modicum of consistency by matching the
17 annualized increase in base revenues to the annualized increases in plant costs from the
18 end of the test year carried into 2027.

19

20 **Q. WHAT IS THE EFFECT OF YOUR RECOMMENDATION?**

21 A. The effect is an approximate \$6.649 million reduction in the second year base revenue
22 increase. The amount of the reduction will depend on the initial base revenue increase
23 because that is the revenue level per customer that will be carried into 2027.

1 **Q. WITNESS CHRONISTER ARGUES THAT THE COMPANY’S EARNINGS WILL**
2 **DECLINE IN 2027 IN THE ABSENCE OF A SECOND YEAR BASE REVENUE**
3 **INCREASE FOR THE COMPANY’S PROPOSED SUBSEQUENT YEAR**
4 **ADJUSTMENTS.⁶⁰ PLEASE RESPOND.**

5 A. This argument is simply a tautology; it is not an argument. The Commission needs to do
6 the right thing, not simply approve a second year base revenue increase to ensure there is
7 no earnings degradation in the year after the test year, and even if it does approve a second
8 year base revenue increase, then it needs to reflect revenue increases as well as plant-related
9 cost reductions in 2027.

10
11 **Q. DESCRIBE THE ERROR IN THE COMPANY’S CALCULATION OF THE**
12 **ANNUALIZED YEAR END PLANT RELATED RATE BASE COMPONENTS**
13 **CARRIED OVER INTO 2027.**

14 A. I have replicated Witness Chronister’s calculation of the second year base revenue increase
15 below.⁶¹ On lines 1-3, Witness Chronister calculates the increase in gross plant at
16 December 31, 2026 that will be included in rate base in 2027. On line 4, Witness Chronister
17 reduces the amount that will be included in rate base in 2027 by one half of the depreciation
18 expense on the increase in gross plant reflected in lines 1-3, rather than by one half of the
19 depreciation expense on the entirety of the gross plant at December 31, 2026. This

⁶⁰ *Id.*, 42.

⁶¹ Exhibit No. JC-1 Document No. 2 page 1 of 4.

1 methodology significantly overstates the net plant in rate base in 2027 and overstates the
 2 second year base revenue requirement for 2027.

PEOPLES GAS SYSTEM, INC.
 2027 SYA

LINE NO.	DESCRIPTION	\$000s AMOUNT	
1	2026 YE NET UTILITY PLANT	\$3,105,644	
2	LESS: 2026 TEST YEAR AVERAGE NET UTILITY PLANT	<u>(\$2,953,333)</u>	
3	EQUALS: 2026 YE NET UTILITY PLANT IN EXCESS OF 2026 AVERAGE	\$152,310	
4	LESS: ANNUALIZATION OF SUBSEQUENT YEAR ACCUMULATED DEPRECIATION (line 16 / 2)	<u>(\$3,267)</u>	
5	EQUALS: INCREMENTAL NET UTILITY PLANT AT END OF TEST YEAR (w/ANNUALIZATION OF ACCUM. DE	\$149,043	
6	RATE OF RETURN - DEBT (PORTION OF 7.57% REQUESTED RATE)	2.23%	
7	NOI REQUESTED - DEBT (line 5 * line 6)	\$3,324	
8	NOI MULTIPLIER - DEBT	<u>1.0079</u>	
9	EQUALS: RETURN ON RATE BASE - DEBT		\$3,350
10	RATE OF RETURN - EQUITY (PORTION OF 7.57% REQUESTED RATE)	5.34%	
11	N.O.I. REQUESTED - EQUITY (line 5 * line 10)	\$7,959	
12	NOI MULTIPLIER - EQUITY	<u>1.3501</u>	
13	EQUALS: RETURN ON RATE BASE - EQUITY		\$10,745
14	ADD: ANNUALIZED YEAR-END PLANT IN SERVICE DEPRECIATION	\$112,687	
15	LESS: 2026 TEST YEAR DEPRECIATION (As filed)	<u>(\$106,153)</u>	
16	EQUALS: INCREMENTAL DEPRECIATION EXPENSE		\$6,534
17	ADD: 2027 PROPERTY TAX BASED ON YE 2026 NET UTILITY PLANT	\$35,403	
18	LESS: 2026 TEST YEAR APPROVED PROPERTY TAX (As filed)	<u>(\$29,323)</u>	
19	EQUALS: INCREMENTAL PROPERTY TAX EXPENSE		<u>\$6,080</u>
20	TOTAL REVENUE REQUIREMENT		<u><u>\$26,709,076</u></u>

3

4 **Q. WHAT IS THE EFFECT OF CORRECTING THAT ERROR?**

5 A. The effect is a reduction in rate base of \$5.645 million and a reduction in the second year
 6 base revenue increase of \$0.534 million.

7

8 **Q. DESCRIBE IN MORE DETAIL THE ERROR IN THE ADIT USED IN THE**
 9 **CALCULATION OF THE CAPITAL STRUCTURE AND RATE OF RETURN**
 10 **FOR 2027.**

11 A. The Company failed to increase the cost-free ADIT in the capital structure used to calculate
 12 the weighted cost of capital applied to annualize the effects of the year end rate base. There
 13 are two components. The first is the increase in ADIT at the end of the test year to match
 14 the increase in the plant related costs at the end of the test year. The second is the additional

1 increase to match the increase in accumulated depreciation in 2027, including the effects
2 of correcting the Company's calculation error.

3
4 **Q. WHAT IS YOUR RECOMMENDATION?**

5 A. I recommend the Commission correct this error and reduce the rate of return to reflect the
6 additional cost-free capital.

7
8 **Q. HAVE YOU QUANTIFIED THE EFFECT OF YOUR RECOMMENDATION?**

9 A. No. The Company refused to provide the ADIT data in response to OPC discovery.⁶²

10
11 **Q. ARE THERE OTHER ADJUSTMENTS TO THE COMPANY'S**
12 **QUANTIFICATION OF THE SECOND YEAR REVENUE INCREASE THAT**
13 **ARE NECESSARY?**

14 A. Yes. First, the cost of capital will need to be modified from the Company's request to the
15 cost of capital approved by the Commission for the test year, as modified for the additional
16 cost-free ADIT from annualizing the plant-related costs that I previously addressed. I note
17 that the revenue adjustment I provided already reflects the recommendations for capital
18 structure and return on equity addressed by OPC witness David Garrett, but does not reflect
19 further adjustment for the additional cost-free ADIT. Second, there is an error in the
20 Company's calculation of property tax expense that needs to be corrected, which I
21 subsequently describe.

⁶² Response to Interrogatory No. 98 in OPC's Second Set of Interrogatories.

1 **Q. DESCRIBE THE COMPANY’S FORECAST PROPERTY TAX EXPENSE FOR**
2 **THE 2027 SYA.**

3 A. The Company forecast property tax expense in the 2027 SYA of \$35.403 million. The
4 Company relied upon the same property tax expense model as relied upon to calculate the
5 test year expense noted above based on a valuation as of January 1, 2027. However, the
6 Company updated the net book value and NOI parameters to match updated actuals and
7 forecasts included in the Company’s 2026 test year revenue requirement calculation. As
8 noted above, the largest driver of the forecast property tax expense increase over that
9 reported for the test year is the change in NOI. The SYA calculation is impacted
10 significantly by the additional NOI forecast based on the Company’s calculated revenue
11 requirement. The Company provided its calculation of the property tax expense for the
12 2027 SYA in response to OPC discovery.⁶³

13
14 **Q. DESCRIBE THE COMPANY’S CALCULATION OF THE NOI PORTION OF**
15 **THE PROPERTY TAX VALUATION FOR THE 2027 SYA.**

16 A. The income approach used by the Company to forecast property tax expense in the test
17 year relies upon actual and forecast NOI for 2024, 2025, and 2026 and weighted the most

⁶³ Response to POD No. 5 in OPC’s First Set of Production of Documents. The applicable file name is Exhibit Support file - 2027 SYA - Property Tax Calculation for 2027 assessment. I have attached a copy of the narrative portion of this response and the worksheet tabs Inc Approach and CountyDetailEstimate as my Exhibit LK-16. The final property tax expense estimate calculation amount is reflected in Cell Q3 of worksheet tab CountyDetailEstimate.

1 current years' data higher than that for the previous years. The Company's 2026 appraisal
2 NOI estimate is replicated below:⁶⁴

Peoples Gas System 2027 Property Tax Budget Appraisal				
Income Approach to Value - As Filed by PGS				
Determine 2027 Net Operating Income to Capitalize				
<u>Year</u>	<u>NOI</u> <u>As Booked</u>	<u>Weight</u>	<u>Weighted</u> <u>NOI</u>	
2024 Actual	\$168,827,176	1	\$28,137,863	
2025 Forecast	\$157,385,906	2	\$52,461,969	
2026 Forecast	\$223,651,232	3	\$111,825,616	
			<u>Weighted Average</u>	<u>Use</u>
			\$192,425,448	\$200,000,000

3
4
5 The Company's 2027 SYA estimate relies upon its forecast NOI for 2026 assuming
6 its rate increase request in this proceeding is authorized in full. The \$223.651 million
7 amount for the 2026 Forecast is computed by multiplying the requested rate base amount
8 of \$2,954.442 million by the requested rate of return of 7.57% and is calculated in the
9 application on Schedule G-5. Even though the weighted NOI calculation was only
10 \$192.425 million, the Company rounded the result up to \$200 million to use in the
11 remaining valuation calculations.

12
13 **Q. HAVE YOU RECOMPUTED THE 2027 SYA PROPERTY TAX ESTIMATE TO**
14 **ACCOUNT FOR THE UPDATED NOI AMOUNTS ASSUMING OPC'S TEST**
15 **YEAR RECOMMENDATIONS ARE ADOPTED BY THE COMMISSION?**

⁶⁴ *Id.*

1 A. Yes. I modified the 2026 Forecast NOI to \$184.874 million, which is calculated by
 2 multiplying the OPC’s recommended rate base amount of \$2,893,174 million by the OPC’s
 3 recommended rate of return of 6.39%. The resulting 2027 SYA appraisal NOI estimate is
 4 presented below:

Peoples Gas System 2027 Property Tax Budget Appraisal
 Income Approach to Value - As Adjusted by OPC
 Determine 2027 Net Operating Income to Capitalize

<u>Year</u>	<u>NOI As Booked</u>	<u>Weight</u>	<u>Weighted NOI</u>	
2024 Actual	\$168,827,176	1	\$28,137,863	
2025 Forecast	\$157,385,906	2	\$52,461,969	
2026 Forecast	\$184,873,821	3	\$92,436,911	
			<u>Weighted Average</u>	<u>Use</u>
			\$173,036,742	\$173,100,000

6
 7
 8 I rounded the weighted average result up to the nearest hundred thousand dollars.
 9 With no other changes made to the Company’s 2027 SYA property tax expense model, the
 10 property tax expense generated from this change is \$32.561 million, a reduction from the
 11 as-filed amount of \$2.842 million.

12
 13 **Q. WHAT IS YOUR RECOMMENDATION?**

14 A. As noted above, my primary recommendation is that the Commission disallow the second
 15 year base revenue increase based on subsequent year adjustments altogether. However, if
 16 the Commission authorizes a second year base revenue increase, then I recommend the

1 Commission reduce the forecast property tax expense to reflect updated NOI amounts
2 based on the 2026 NOI authorized in this proceeding.

3

4 **Q. WHAT IS THE EFFECT OF YOUR RECOMMENDATION?**

5 A. The effect is a \$2.842 million reduction in property tax expense and a \$2.842 million
6 reduction in the requested second year base revenue increase since there is no gross-up for
7 Commission assessment fees and bad debt expense.

8

9 **Q. CAN YOU SUMMARIZE THE EFFECTS OF YOUR PRIMARY AND**
10 **ALTERNATIVE SYA RECOMMENDATIONS?**

11 A. Yes. The table below summarizes both; however, as I noted previously, I was not able to
12 quantify the effects of the incremental cost-free ADIT due to the Company's refusal to
13 provide the information in response to OPC discovery. The Commission should require the
14 Company to provide this information and include the savings through a reduction in the
15 grossed up rate of return.

**PEOPLES GAS SYSTEM, INC.
REVENUE REQUIREMENT RECOMMENDED BY OPC
BASE RATES CHANGE FOR 2027 SYA
DOCKET NO. 20250029-GU
TEST YEAR ENDING DECEMBER 31, 2026
(\$ MILLIONS)**

	2027 SYA
Base Rate Change for 2027 SYA per PGS Filing	26.709
Remove Requested Rate Change	(26.709)
OPC Recommended Maximum 2027 SYA Rate Change	-
OPC Alternative Recommendation	
Revenue Requirement Adjustments:	
Reflect Additional Revenue Due to Customer Growth Through Test Year End	(6.649)
Reflect Additional Accumulated Depreciation on 2026 Plant Additions	(0.534)
Remove Excessive Property Tax Expense	(2.842)
Adjust Rate of Return Based on Changes to Capital Structure and ROE	(2.422)
Total OPC Adjustments	(12.446)
OPC Recommended Maximum 2027 SYA Rate Change	14.263

1

2 **Q. DOES THIS COMPLETE YOUR PREPARED DIRECT TESTIMONY?**

3 A. Yes. However, I note that my testimony only addresses specific issues. That fact should
4 not be construed to mean that I concur with the balance of the Company’s filing. I reserve
5 the right to revise my testimony based on subsequent and/or revised discovery responses
6 or changes in the Company’s filing, including, but not limited to, additional corrections of
7 errors in its filing.

RESUME OF LANE KOLLEN, PRESIDENT

EDUCATION

University of Toledo, BBA
Accounting

University of Toledo, MBA

Luther Rice University, MA

PROFESSIONAL CERTIFICATIONS

Certified Public Accountant (CPA)

Certified Management Accountant (CMA)

Chartered Global Management Accountant (CGMA)

PROFESSIONAL AFFILIATIONS

American Institute of Certified Public Accountants

Georgia Society of Certified Public Accountants

Institute of Management Accountants

Society of Depreciation Professionals

Mr. Kollen has more than forty years of utility industry experience in the financial, rate, tax, and planning areas. He specializes in revenue requirements analyses, taxes, evaluation of rate and financial impacts of traditional and nontraditional ratemaking, utility mergers/acquisition and diversification. Mr. Kollen has expertise in proprietary and nonproprietary software systems used by utilities for budgeting, rate case support and strategic and financial planning.

RESUME OF LANE KOLLEN, PRESIDENT

EXPERIENCE

1986 to

Present:

J. Kennedy and Associates, Inc.: Vice President and Principal. Responsible for utility stranded cost analysis, revenue requirements analysis, cash flow projections and solvency, financial and cash effects of traditional and nontraditional ratemaking, and research, speaking and writing on the effects of tax law changes. Testimony before Connecticut, Florida, Georgia, Indiana, Louisiana, Kentucky, Maine, Maryland, Minnesota, New York, North Carolina, Ohio, Pennsylvania, Tennessee, Texas, West Virginia and Wisconsin state regulatory commissions and the Federal Energy Regulatory Commission.

1983 to

1986:

Energy Management Associates: Lead Consultant.

Consulting in the areas of strategic and financial planning, traditional and nontraditional ratemaking, rate case support and testimony, diversification and generation expansion planning. Directed consulting and software development projects utilizing PROSCREEN II and ACUMEN proprietary software products. Utilized ACUMEN detailed corporate simulation system, PROSCREEN II strategic planning system and other custom developed software to support utility rate case filings including test year revenue requirements, rate base, operating income and pro-forma adjustments. Also utilized these software products for revenue simulation, budget preparation and cost-of-service analyses.

1976 to

1983:

The Toledo Edison Company: Planning Supervisor.

Responsible for financial planning activities including generation expansion planning, capital and expense budgeting, evaluation of tax law changes, rate case strategy and support and computerized financial modeling using proprietary and nonproprietary software products. Directed the modeling and evaluation of planning alternatives including:

Rate phase-ins.

Construction project cancellations and write-offs.

Construction project delays.

Capacity swaps.

Financing alternatives.

Competitive pricing for off-system sales.

Sale/leasebacks.

RESUME OF LANE KOLLEN, PRESIDENT

CLIENTS SERVED

Industrial Companies and Groups

Air Products and Chemicals, Inc.	Lehigh Valley Power Committee
Airco Industrial Gases	Maryland Industrial Group
Alcan Aluminum	Multiple Intervenors (New York)
Armco Advanced Materials Co.	National Southwire
Armco Steel	North Carolina Industrial
Bethlehem Steel	Energy Consumers
CF&I Steel, L.P.	Occidental Chemical Corporation
Climax Molybdenum Company	Ohio Energy Group
Connecticut Industrial Energy Consumers	Ohio Industrial Energy Consumers
ELCON	Ohio Manufacturers Association
Enron Gas Pipeline Company	Philadelphia Area Industrial Energy
Florida Industrial Power Users Group	Users Group
Gallatin Steel	PSI Industrial Group
General Electric Company	Smith Cogeneration
GPU Industrial Intervenors	Taconite Intervenors (Minnesota)
Indiana Industrial Group	West Penn Power Industrial Intervenors
Industrial Consumers for	West Virginia Energy Users Group
Fair Utility Rates - Indiana	Westvaco Corporation
Industrial Energy Consumers - Ohio	
Kentucky Industrial Utility Customers, Inc.	
Kimberly-Clark Company	

Regulatory Commissions and Government Agencies

Cities in Texas-New Mexico Power Company's Service Territory
Cities in AEP Texas Central Company's Service Territory
Cities in AEP Texas North Company's Service Territory
City of Austin
Georgia Public Service Commission Staff
Florida Office of Public Counsel
Indiana Office of Utility Consumer Counsel
Kentucky Office of Attorney General
Louisiana Public Service Commission
Louisiana Public Service Commission Staff
Maine Office of Public Advocate
New York City
New York State Energy Office
South Carolina Office of Regulatory Staff
Texas Office of Public Utility Counsel
Utah Office of Consumer Services

RESUME OF LANE KOLLEN, PRESIDENT

Utilities

Allegheny Power System
Atlantic City Electric Company
Carolina Power & Light Company
Cleveland Electric Illuminating Company
Delmarva Power & Light Company
Duquesne Light Company
General Public Utilities
Georgia Power Company
Middle South Services
Nevada Power Company
Niagara Mohawk Power Corporation

Otter Tail Power Company
Pacific Gas & Electric Company
Public Service Electric & Gas
Public Service of Oklahoma
Rochester Gas and Electric
Savannah Electric & Power Company
Seminole Electric Cooperative
Southern California Edison
Talquin Electric Cooperative
Tampa Electric
Texas Utilities
Toledo Edison Company

**Expert Testimony Appearances
of
Lane Kollen
As of June 2025**

Date	Case	Jurisdict.	Party	Utility	Subject
10/86	U-17282 Interim	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Cash revenue requirements financial solvency.
11/86	U-17282 Interim Rebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Cash revenue requirements financial solvency.
12/86	9613	KY	Attorney General Div. of Consumer Protection	Big Rivers Electric Corp.	Revenue requirements accounting adjustments financial workout plan.
1/87	U-17282 Interim	LA 19th Judicial District Ct.	Louisiana Public Service Commission Staff	Gulf States Utilities	Cash revenue requirements, financial solvency.
3/87	General Order 236	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Tax Reform Act of 1986.
4/87	U-17282 Prudence	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Prudence of River Bend 1, economic analyses, cancellation studies.
4/87	M-100 Sub 113	NC	North Carolina Industrial Energy Consumers	Duke Power Co.	Tax Reform Act of 1986.
5/87	86-524-E-SC	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Revenue requirements, Tax Reform Act of 1986.
5/87	U-17282 Case In Chief	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, River Bend 1 phase-in plan, financial solvency.
7/87	U-17282 Case In Chief Surrebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, River Bend 1 phase-in plan, financial solvency.
7/87	U-17282 Prudence Surrebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Prudence of River Bend 1, economic analyses, cancellation studies.
7/87	86-524 E-SC Surrebuttal	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Revenue requirements, Tax Reform Act of 1986.
8/87	9885	KY	Attorney General Div. of Consumer Protection	Big Rivers Electric Corp.	Financial workout plan.
8/87	E-015/GR-87-223	MN	Taconite Intervenors	Minnesota Power & Light Co.	Revenue requirements, O&M expense, Tax Reform Act of 1986.
10/87	870220-EI	FL	Occidental Chemical Corp.	Florida Power Corp.	Revenue requirements, O&M expense, Tax Reform Act of 1986.
11/87	87-07-01	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Tax Reform Act of 1986.
1/88	U-17282	LA 19th Judicial District Ct.	Louisiana Public Service Commission	Gulf States Utilities	Revenue requirements, River Bend 1 phase-in plan, rate of return.
2/88	9934	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Co.	Economics of Trimble County, completion.
2/88	10064	KY	Kentucky Industrial Utility	Louisville Gas &	Revenue requirements, O&M expense, capital

**Expert Testimony Appearances
 of
 Lane Kollen
 As of June 2025**

Date	Case	Jurisdiction	Party	Utility	Subject
			Customers	Electric Co.	structure, excess deferred income taxes.
5/88	10217	KY	Alcan Aluminum National Southwire	Big Rivers Electric Corp.	Financial workout plan.
5/88	M-87017-1C001	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Nonutility generator deferred cost recovery.
5/88	M-87017-2C005	PA	GPU Industrial Intervenors	Pennsylvania Electric Co.	Nonutility generator deferred cost recovery.
6/88	U-17282	LA 19th Judicial District Ct.	Louisiana Public Service Commission	Gulf States Utilities	Prudence of River Bend 1 economic analyses, cancellation studies, financial modeling.
7/88	M-87017-1C001 Rebuttal	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Nonutility generator deferred cost recovery, SFAS No. 92.
7/88	M-87017-2C005 Rebuttal	PA	GPU Industrial Intervenors	Pennsylvania Electric Co.	Nonutility generator deferred cost recovery, SFAS No. 92.
9/88	88-05-25	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Excess deferred taxes, O&M expenses.
9/88	10064 Rehearing	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Co.	Premature retirements, interest expense.
10/88	88-170-EL-AIR	OH	Ohio Industrial Energy Consumers	Cleveland Electric Illuminating Co.	Revenue requirements, phase-in, excess deferred taxes, O&M expenses, financial considerations, working capital.
10/88	88-171-EL-AIR	OH	Ohio Industrial Energy Consumers	Toledo Edison Co.	Revenue requirements, phase-in, excess deferred taxes, O&M expenses, financial considerations, working capital.
10/88	8800-355-EI	FL	Florida Industrial Power Users' Group	Florida Power & Light Co.	Tax Reform Act of 1986, tax expenses, O&M expenses, pension expense (SFAS No. 87).
10/88	3780-U	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Co.	Pension expense (SFAS No. 87).
11/88	U-17282 Remand	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Rate base exclusion plan (SFAS No. 71).
12/88	U-17970	LA	Louisiana Public Service Commission Staff	AT&T Communications of South Central States	Pension expense (SFAS No. 87).
12/88	U-17949 Rebuttal	LA	Louisiana Public Service Commission Staff	South Central Bell	Compensated absences (SFAS No. 43), pension expense (SFAS No. 87), Part 32, income tax normalization.
2/89	U-17282 Phase II	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, phase-in of River Bend 1, recovery of canceled plant.
6/89	881602-EU 890326-EU	FL	Talquin Electric Cooperative	Talquin/City of Tallahassee	Economic analyses, incremental cost-of-service, average customer rates.

**Expert Testimony Appearances
 of
 Lane Kollen
 As of June 2025**

Date	Case	Jurisdct.	Party	Utility	Subject
7/89	U-17970	LA	Louisiana Public Service Commission Staff	AT&T Communications of South Central States	Pension expense (SFAS No. 87), compensated absences (SFAS No. 43), Part 32.
8/89	8555	TX PUCT	Occidental Chemical Corp.	Houston Lighting & Power Co.	Cancellation cost recovery, tax expense, revenue requirements.
8/89	3840-U	GA	Georgia Public Service Commission Staff	Georgia Power Co.	Promotional practices, advertising, economic development.
9/89	U-17282 Phase II Detailed	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, detailed investigation.
10/89	8880	TX PUCT	Enron Gas Pipeline	Texas-New Mexico Power Co.	Deferred accounting treatment, sale/leaseback.
10/89	8928	TX PUCT	Enron Gas Pipeline	Texas-New Mexico Power Co.	Revenue requirements, imputed capital structure, cash working capital.
10/89	R-891364	PA	Philadelphia Area Industrial Energy Users Group	Philadelphia Electric Co.	Revenue requirements.
11/89 12/89	R-891364 Surrebuttal (2 Filings)	PA	Philadelphia Area Industrial Energy Users Group	Philadelphia Electric Co.	Revenue requirements, sale/leaseback.
1/90	U-17282 Phase II Detailed Rebuttal	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, detailed investigation.
1/90	U-17282 Phase III	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Phase-in of River Bend 1, deregulated asset plan.
3/90	890319-EI	FL	Florida Industrial Power Users Group	Florida Power & Light Co.	O&M expenses, Tax Reform Act of 1986.
4/90	890319-EI Rebuttal	FL	Florida Industrial Power Users Group	Florida Power & Light Co.	O&M expenses, Tax Reform Act of 1986.
4/90	U-17282	LA 19 th Judicial District Ct.	Louisiana Public Service Commission	Gulf States Utilities	Fuel clause, gain on sale of utility assets.
9/90	90-158	KY	Kentucky Industrial Utility Customers	Louisville Gas & Electric Co.	Revenue requirements, post-test year additions, forecasted test year.
12/90	U-17282 Phase IV	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements.
3/91	29327, et. al.	NY	Multiple Intervenors	Niagara Mohawk Power Corp.	Incentive regulation.
5/91	9945	TX PUCT	Office of Public Utility Counsel of Texas	El Paso Electric Co.	Financial modeling, economic analyses, prudence of Palo Verde 3.

**Expert Testimony Appearances
of
Lane Kollen
As of June 2025**

Date	Case	Jurisdict.	Party	Utility	Subject
9/91	P-910511 P-910512	PA	Allegheny Ludlum Corp., Armco Advanced Materials Co., The West Penn Power Industrial Users' Group	West Penn Power Co.	Recovery of CAAA costs, least cost financing.
9/91	91-231-E-NC	WV	West Virginia Energy Users Group	Monongahela Power Co.	Recovery of CAAA costs, least cost financing.
11/91	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Asset impairment, deregulated asset plan, revenue requirements.
12/91	91-410-EL-AIR	OH	Air Products and Chemicals, Inc., Armco Steel Co., General Electric Co., Industrial Energy Consumers	Cincinnati Gas & Electric Co.	Revenue requirements, phase-in plan.
12/91	PUC Docket 10200	TX PUCT	Office of Public Utility Counsel of Texas	Texas-New Mexico Power Co.	Financial integrity, strategic planning, declined business affiliations.
5/92	910890-EI	FL	Occidental Chemical Corp.	Florida Power Corp.	Revenue requirements, O&M expense, pension expense, OPEB expense, fossil dismantling, nuclear decommissioning.
8/92	R-00922314	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Incentive regulation, performance rewards, purchased power risk, OPEB expense.
9/92	92-043	KY	Kentucky Industrial Utility Consumers	Generic Proceeding	OPEB expense.
9/92	920324-EI	FL	Florida Industrial Power Users' Group	Tampa Electric Co.	OPEB expense.
9/92	39348	IN	Indiana Industrial Group	Generic Proceeding	OPEB expense.
9/92	910840-PU	FL	Florida Industrial Power Users' Group	Generic Proceeding	OPEB expense.
9/92	39314	IN	Industrial Consumers for Fair Utility Rates	Indiana Michigan Power Co.	OPEB expense.
11/92	U-19904	LA	Louisiana Public Service Commission Staff	Gulf States Utilities /Entergy Corp.	Merger.
11/92	8469	MD	Westvaco Corp., Eastalco Aluminum Co.	Potomac Edison Co.	OPEB expense.
11/92	92-1715-AU-COI	OH	Ohio Manufacturers Association	Generic Proceeding	OPEB expense.
12/92	R-00922378	PA	Armco Advanced Materials Co., The WPP Industrial Intervenors	West Penn Power Co.	Incentive regulation, performance rewards, purchased power risk, OPEB expense.
12/92	U-19949	LA	Louisiana Public Service Commission Staff	South Central Bell	Affiliate transactions, cost allocations, merger.

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12/92	R-00922479	PA	Philadelphia Area Industrial Energy Users' Group	Philadelphia Electric Co.	OPEB expense.
1/93	8487	MD	Maryland Industrial Group	Baltimore Gas & Electric Co., Bethlehem Steel Corp.	OPEB expense, deferred fuel, CWIP in rate base.
1/93	39498	IN	PSI Industrial Group	PSI Energy, Inc.	Refunds due to over-collection of taxes on Marble Hill cancellation.
3/93	92-11-11	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co	OPEB expense.
3/93	U-19904 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities /Entergy Corp.	Merger.
3/93	93-01-EL-EFC	OH	Ohio Industrial Energy Consumers	Ohio Power Co.	Affiliate transactions, fuel.
3/93	EC92-21000 ER92-806-000	FERC	Louisiana Public Service Commission Staff	Gulf States Utilities /Entergy Corp.	Merger.
4/93	92-1464-EL-AIR	OH	Air Products Armco Steel Industrial Energy Consumers	Cincinnati Gas & Electric Co.	Revenue requirements, phase-in plan.
4/93	EC92-21000 ER92-806-000 (Rebuttal)	FERC	Louisiana Public Service Commission	Gulf States Utilities /Entergy Corp.	Merger.
9/93	93-113	KY	Kentucky Industrial Utility Customers	Kentucky Utilities	Fuel clause and coal contract refund.
9/93	92-490, 92-490A, 90-360-C	KY	Kentucky Industrial Utility Customers and Kentucky Attorney General	Big Rivers Electric Corp.	Disallowances and restitution for excessive fuel costs, illegal and improper payments, recovery of mine closure costs.
10/93	U-17735	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	Revenue requirements, debt restructuring agreement, River Bend cost recovery.
1/94	U-20647	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Audit and investigation into fuel clause costs.
4/94	U-20647 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Nuclear and fossil unit performance, fuel costs, fuel clause principles and guidelines.
4/94	U-20647 (Supplemental Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Audit and investigation into fuel clause costs.
5/94	U-20178	LA	Louisiana Public Service Commission Staff	Louisiana Power & Light Co.	Planning and quantification issues of least cost integrated resource plan.
9/94	U-19904 Initial Post-Merger Earnings Review	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	River Bend phase-in plan, deregulated asset plan, capital structure, other revenue requirement issues.

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9/94	U-17735	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	G&T cooperative ratemaking policies, exclusion of River Bend, other revenue requirement issues.
10/94	3905-U	GA	Georgia Public Service Commission Staff	Southern Bell Telephone Co.	Incentive rate plan, earnings review.
10/94	5258-U	GA	Georgia Public Service Commission Staff	Southern Bell Telephone Co.	Alternative regulation, cost allocation.
11/94	U-19904 Initial Post-Merger Earnings Review (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	River Bend phase-in plan, deregulated asset plan, capital structure, other revenue requirement issues.
11/94	U-17735 (Rebuttal)	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	G&T cooperative ratemaking policy, exclusion of River Bend, other revenue requirement issues.
4/95	R-00943271	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Revenue requirements. Fossil dismantling, nuclear decommissioning.
6/95	3905-U Rebuttal	GA	Georgia Public Service Commission	Southern Bell Telephone Co.	Incentive regulation, affiliate transactions, revenue requirements, rate refund.
6/95	U-19904 (Direct)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Gas, coal, nuclear fuel costs, contract prudence, base/fuel realignment.
10/95	95-02614	TN	Tennessee Office of the Attorney General Consumer Advocate	BellSouth Telecommunications, Inc.	Affiliate transactions.
10/95	U-21485 (Direct)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Nuclear O&M, River Bend phase-in plan, base/fuel realignment, NOL and AltMin asset deferred taxes, other revenue requirement issues.
11/95	U-19904 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co. Division	Gas, coal, nuclear fuel costs, contract prudence, base/fuel realignment.
11/95	U-21485 (Supplemental Direct)	LA	Louisiana Public Service Commission Staff	Gulf States Utilities Co.	Nuclear O&M, River Bend phase-in plan, base/fuel realignment, NOL and AltMin asset deferred taxes, other revenue requirement issues.
12/95	U-21485 (Surrebuttal)				
12/95	95-299-EL-AIR 95-300-EL-AIR	OH	Industrial Energy Consumers	The Toledo Edison Co., The Cleveland Electric Illuminating Co.	Competition, asset write-offs and revaluation, O&M expense, other revenue requirement issues.
2/96	PUC Docket 14965	TX PUCT	Office of Public Utility Counsel	Central Power & Light	Nuclear decommissioning.
5/96	95-485-LCS	NM	City of Las Cruces	El Paso Electric Co.	Stranded cost recovery, municipalization.
7/96	8725	MD	The Maryland Industrial Group and Redland Genstar, Inc.	Baltimore Gas & Electric Co., Potomac Electric Power Co., and Constellation Energy Corp.	Merger savings, tracking mechanism, earnings sharing plan, revenue requirement issues.

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9/96 11/96	U-22092 U-22092 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	River Bend phase-in plan, base/fuel realignment, NOL and AltMin asset deferred taxes, other revenue requirement issues, allocation of regulated/nonregulated costs.
10/96	96-327	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Environmental surcharge recoverable costs.
2/97	R-00973877	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Stranded cost recovery, regulatory assets and liabilities, intangible transition charge, revenue requirements.
3/97	96-489	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	Environmental surcharge recoverable costs, system agreements, allowance inventory, jurisdictional allocation.
6/97	TO-97-397	MO	MCI Telecommunications Corp., Inc., MCImetro Access Transmission Services, Inc.	Southwestern Bell Telephone Co.	Price cap regulation, revenue requirements, rate of return.
6/97	R-00973953	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
7/97	R-00973954	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
7/97	U-22092	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Depreciation rates and methodologies, River Bend phase-in plan.
8/97	97-300	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co., Kentucky Utilities Co.	Merger policy, cost savings, surcredit sharing mechanism, revenue requirements, rate of return.
8/97	R-00973954 (Surrebuttal)	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
10/97	97-204	KY	Alcan Aluminum Corp. Southwire Co.	Big Rivers Electric Corp.	Restructuring, revenue requirements, reasonableness.
10/97	R-974008	PA	Metropolitan Edison Industrial Users Group	Metropolitan Edison Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements.
10/97	R-974009	PA	Penelec Industrial Customer Alliance	Pennsylvania Electric Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements.
11/97	97-204 (Rebuttal)	KY	Alcan Aluminum Corp. Southwire Co.	Big Rivers Electric Corp.	Restructuring, revenue requirements, reasonableness of rates, cost allocation.
11/97	U-22491	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, other revenue requirement issues.

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11/97	R-00973953 (Surrebuttal)	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning.
11/97	R-973981	PA	West Penn Power Industrial Intervenor	West Penn Power Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, fossil decommissioning, revenue requirements, securitization.
11/97	R-974104	PA	Duquesne Industrial Intervenor	Duquesne Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements, securitization.
12/97	R-973981 (Surrebuttal)	PA	West Penn Power Industrial Intervenor	West Penn Power Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, fossil decommissioning, revenue requirements.
12/97	R-974104 (Surrebuttal)	PA	Duquesne Industrial Intervenor	Duquesne Light Co.	Restructuring, deregulation, stranded costs, regulatory assets, liabilities, nuclear and fossil decommissioning, revenue requirements, securitization.
1/98	U-22491 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, other revenue requirement issues.
2/98	8774	MD	Westvaco	Potomac Edison Co.	Merger of Duquesne, AE, customer safeguards, savings sharing.
3/98	U-22092 (Allocated Stranded Cost Issues)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Restructuring, stranded costs, regulatory assets, securitization, regulatory mitigation.
3/98	8390-U	GA	Georgia Natural Gas Group, Georgia Textile Manufacturers Assoc.	Atlanta Gas Light Co.	Restructuring, unbundling, stranded costs, incentive regulation, revenue requirements.
3/98	U-22092 (Allocated Stranded Cost Issues) (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Restructuring, stranded costs, regulatory assets, securitization, regulatory mitigation.
3/98	U-22491 (Supplemental Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, other revenue requirement issues.
10/98	97-596	ME	Maine Office of the Public Advocate	Bangor Hydro-Electric Co.	Restructuring, unbundling, stranded costs, T&D revenue requirements.
10/98	9355-U	GA	Georgia Public Service Commission Adversary Staff	Georgia Power Co.	Affiliate transactions.
10/98	U-17735 Rebuttal	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	G&T cooperative ratemaking policy, other revenue requirement issues.

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Date	Case	Jurisdct.	Party	Utility	Subject
11/98	U-23327	LA	Louisiana Public Service Commission Staff	SWEPCO, CSW and AEP	Merger policy, savings sharing mechanism, affiliate transaction conditions.
12/98	U-23358 (Direct)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
12/98	98-577	ME	Maine Office of Public Advocate	Maine Public Service Co.	Restructuring, unbundling, stranded cost, T&D revenue requirements.
1/99	98-10-07	CT	Connecticut Industrial Energy Consumers	United Illuminating Co.	Stranded costs, investment tax credits, accumulated deferred income taxes, excess deferred income taxes.
3/99	U-23358 (Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
3/99	98-474	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements, alternative forms of regulation.
3/99	98-426	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements, alternative forms of regulation.
3/99	99-082	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements.
3/99	99-083	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements.
4/99	U-23358 (Supplemental Surrebuttal)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
4/99	99-03-04	CT	Connecticut Industrial Energy Consumers	United Illuminating Co.	Regulatory assets and liabilities, stranded costs, recovery mechanisms.
4/99	99-02-05	CT	Connecticut Industrial Utility Customers	Connecticut Light and Power Co.	Regulatory assets and liabilities, stranded costs, recovery mechanisms.
5/99	98-426 99-082 (Additional Direct)	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements.
5/99	98-474 99-083 (Additional Direct)	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements.
5/99	98-426 98-474 (Response to Amended Applications)	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co., Kentucky Utilities Co.	Alternative regulation.
6/99	97-596	ME	Maine Office of Public Advocate	Bangor Hydro-Electric Co.	Request for accounting order regarding electric industry restructuring costs.
7/99	U-23358	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Affiliate transactions, cost allocations.

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Date	Case	Jurisdct.	Party	Utility	Subject
7/99	99-03-35	CT	Connecticut Industrial Energy Consumers	United Illuminating Co.	Stranded costs, regulatory assets, tax effects of asset divestiture.
7/99	U-23327	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Co., Central and South West Corp, American Electric Power Co.	Merger Settlement and Stipulation.
7/99	97-596 Surrebuttal	ME	Maine Office of Public Advocate	Bangor Hydro-Electric Co.	Restructuring, unbundling, stranded cost, T&D revenue requirements.
7/99	98-0452-E-GI	WV	West Virginia Energy Users Group	Monongahela Power, Potomac Edison, Appalachian Power, Wheeling Power	Regulatory assets and liabilities.
8/99	98-577 Surrebuttal	ME	Maine Office of Public Advocate	Maine Public Service Co.	Restructuring, unbundling, stranded costs, T&D revenue requirements.
8/99	98-426 99-082 Rebuttal	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co.	Revenue requirements.
8/99	98-474 98-083 Rebuttal	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements.
8/99	98-0452-E-GI Rebuttal	WV	West Virginia Energy Users Group	Monongahela Power, Potomac Edison, Appalachian Power, Wheeling Power	Regulatory assets and liabilities.
10/99	U-24182 Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, affiliate transactions, tax issues, and other revenue requirement issues.
11/99	PUC Docket 21527	TX PUCT	The Dallas-Fort Worth Hospital Council and Coalition of Independent Colleges and Universities	TXU Electric	Restructuring, stranded costs, taxes, securitization.
11/99	U-23358 Surrebuttal Affiliate Transactions Review	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Service company affiliate transaction costs.
01/00	U-24182 Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, affiliate transactions, tax issues, and other revenue requirement issues.
04/00	99-1212-EL-ETP 99-1213-EL-ATA 99-1214-EL-AAM	OH	Greater Cleveland Growth Association	First Energy (Cleveland Electric Illuminating, Toledo Edison)	Historical review, stranded costs, regulatory assets, liabilities.

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Date	Case	Jurisdct.	Party	Utility	Subject
05/00	2000-107	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	ECR surcharge roll-in to base rates.
05/00	U-24182 Supplemental Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Affiliate expense proforma adjustments.
05/00	A-110550F0147	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy	Merger between PECO and Unicom.
05/00	99-1658-EL-ETP	OH	AK Steel Corp.	Cincinnati Gas & Electric Co.	Regulatory transition costs, including regulatory assets and liabilities, SFAS 109, ADIT, EDIT, ITC.
07/00	PUC Docket 22344	TX PUCT	The Dallas-Fort Worth Hospital Council and The Coalition of Independent Colleges and Universities	Statewide Generic Proceeding	Escalation of O&M expenses for unbundled T&D revenue requirements in projected test year.
07/00	U-21453	LA	Louisiana Public Service Commission	SWEPCO	Stranded costs, regulatory assets and liabilities.
08/00	U-24064	LA	Louisiana Public Service Commission Staff	CLECO	Affiliate transaction pricing ratemaking principles, subsidization of nonregulated affiliates, ratemaking adjustments.
10/00	SOAH Docket 473-00-1015 PUC Docket 22350	TX PUCT	The Dallas-Fort Worth Hospital Council and The Coalition of Independent Colleges and Universities	TXU Electric Co.	Restructuring, T&D revenue requirements, mitigation, regulatory assets and liabilities.
10/00	R-00974104 Affidavit	PA	Duquesne Industrial Intervenor	Duquesne Light Co.	Final accounting for stranded costs, including treatment of auction proceeds, taxes, capital costs, switchback costs, and excess pension funding.
11/00	P-00001837 R-00974008 P-00001838 R-00974009	PA	Metropolitan Edison Industrial Users Group Penelec Industrial Customer Alliance	Metropolitan Edison Co., Pennsylvania Electric Co.	Final accounting for stranded costs, including treatment of auction proceeds, taxes, regulatory assets and liabilities, transaction costs.
12/00	U-21453, U-20925, U-22092 (Subdocket C) Surrebuttal	LA	Louisiana Public Service Commission Staff	SWEPCO	Stranded costs, regulatory assets.
01/01	U-24993 Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Allocation of regulated and nonregulated costs, tax issues, and other revenue requirement issues.
01/01	U-21453, U-20925, U-22092 (Subdocket B) Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Industry restructuring, business separation plan, organization structure, hold harmless conditions, financing.
01/01	Case No. 2000-386	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co.	Recovery of environmental costs, surcharge mechanism.

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Date	Case	Jurisdct.	Party	Utility	Subject
01/01	Case No. 2000-439	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Recovery of environmental costs, surcharge mechanism.
02/01	A-110300F0095 A-110400F0040	PA	Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance	GPU, Inc. FirstEnergy Corp.	Merger, savings, reliability.
03/01	P-00001860 P-00001861	PA	Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance	Metropolitan Edison Co., Pennsylvania Electric Co.	Recovery of costs due to provider of last resort obligation.
04/01	U-21453, U-20925, U-22092 (Subdocket B) Settlement Term Sheet	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: settlement agreement on overall plan structure.
04/01	U-21453, U-20925, U-22092 (Subdocket B) Contested Issues	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: agreements, hold harmless conditions, separations methodology.
05/01	U-21453, U-20925, U-22092 (Subdocket B) Contested Issues Transmission and Distribution Rebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: agreements, hold harmless conditions, separations methodology.
07/01	U-21453, U-20925, U-22092 (Subdocket B) Transmission and Distribution Term Sheet	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Business separation plan: settlement agreement on T&D issues, agreements necessary to implement T&D separations, hold harmless conditions, separations methodology.
10/01	14000-U	GA	Georgia Public Service Commission Adversary Staff	Georgia Power Company	Revenue requirements, Rate Plan, fuel clause recovery.
11/01	14311-U Direct Panel with Bolin Killings	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co	Revenue requirements, revenue forecast, O&M expense, depreciation, plant additions, cash working capital.
11/01	U-25687 Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, capital structure, allocation of regulated and nonregulated costs, River Bend uprate.
02/02	PUC Docket 25230	TX PUCT	The Dallas-Fort Worth Hospital Council and the Coalition of Independent Colleges and Universities	TXU Electric	Stipulation. Regulatory assets, securitization financing.

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Date	Case	Jurisdct.	Party	Utility	Subject
02/02	U-25687 Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, River Bend uprate.
03/02	14311-U Rebuttal Panel with Bolin Killings	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Revenue requirements, earnings sharing plan, service quality standards.
03/02	14311-U Rebuttal Panel with Michelle L. Thebert	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Revenue requirements, revenue forecast, O&M expense, depreciation, plant additions, cash working capital.
03/02	001148-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Co.	Revenue requirements. Nuclear life extension, storm damage accruals and reserve, capital structure, O&M expense.
04/02	U-25687 (Suppl. Surrebuttal)	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, River Bend uprate.
04/02	U-21453, U-20925 U-22092 (Subdocket C)	LA	Louisiana Public Service Commission	SWEPSCO	Business separation plan, T&D Term Sheet, separations methodologies, hold harmless conditions.
08/02	EL01-88-000	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement, production cost equalization, tariffs.
08/02	U-25888	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc. and Entergy Louisiana, Inc.	System Agreement, production cost disparities, prudence.
09/02	2002-00224 2002-00225	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Line losses and fuel clause recovery associated with off-system sales.
11/02	2002-00146 2002-00147	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Environmental compliance costs and surcharge recovery.
01/03	2002-00169	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Power Co.	Environmental compliance costs and surcharge recovery.
04/03	2002-00429 2002-00430	KY	Kentucky Industrial Utilities Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Extension of merger surcredit, flaws in Companies' studies.
04/03	U-26527	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, capital structure, post-test year adjustments.
06/03	EL01-88-000 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	System Agreement, production cost equalization, tariffs.

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Date	Case	Jurisdct.	Party	Utility	Subject
06/03	2003-00068	KY	Kentucky Industrial Utility Customers	Kentucky Utilities Co.	Environmental cost recovery, correction of base rate error.
11/03	ER03-753-000	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Unit power purchases and sale cost-based tariff pursuant to System Agreement.
11/03	ER03-583-000, ER03-583-001, ER03-583-002 ER03-681-000, ER03-681-001 ER03-682-000, ER03-682-001, ER03-682-002 ER03-744-000, ER03-744-001 (Consolidated)	FERC	Louisiana Public Service Commission	Entergy Services, Inc., the Entergy Operating Companies, EWO Marketing, L.P, and Entergy Power, Inc.	Unit power purchases and sale agreements, contractual provisions, projected costs, leveled rates, and formula rates.
12/03	U-26527 Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, capital structure, post-test year adjustments.
12/03	2003-0334 2003-0335	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Earnings Sharing Mechanism.
12/03	U-27136	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, Inc.	Purchased power contracts between affiliates, terms and conditions.
03/04	U-26527 Supplemental Surrebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Revenue requirements, corporate franchise tax, conversion to LLC, capital structure, post-test year adjustments.
03/04	2003-00433	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co.	Revenue requirements, depreciation rates, O&M expense, deferrals and amortization, earnings sharing mechanism, merger surcredit, VDT surcredit.
03/04	2003-00434	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co.	Revenue requirements, depreciation rates, O&M expense, deferrals and amortization, earnings sharing mechanism, merger surcredit, VDT surcredit.
03/04	SOAH Docket 473-04-2459 PUC Docket 29206	TX PUCT	Cities Served by Texas-New Mexico Power Co.	Texas-New Mexico Power Co.	Stranded costs true-up, including valuation issues, ITC, ADIT, excess earnings.
05/04	04-169-EL-UNC	OH	Ohio Energy Group, Inc.	Columbus Southern Power Co. & Ohio Power Co.	Rate stabilization plan, deferrals, T&D rate increases, earnings.
06/04	SOAH Docket 473-04-4555 PUC Docket 29526	TX PUCT	Houston Council for Health and Education	CenterPoint Energy Houston Electric	Stranded costs true-up, including valuation issues, ITC, EDIT, excess mitigation credits, capacity auction true-up revenues, interest.

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Date	Case	Jurisdct.	Party	Utility	Subject
08/04	SOAH Docket 473-04-4555 PUC Docket 29526 (Suppl Direct)	TX PUCT	Houston Council for Health and Education	CenterPoint Energy Houston Electric	Interest on stranded cost pursuant to Texas Supreme Court remand.
09/04	U-23327 Subdocket B	LA	Louisiana Public Service Commission Staff	SWEPCO	Fuel and purchased power expenses recoverable through fuel adjustment clause, trading activities, compliance with terms of various LPSC Orders.
10/04	U-23327 Subdocket A	LA	Louisiana Public Service Commission Staff	SWEPCO	Revenue requirements.
12/04	Case Nos. 2004-00321, 2004-00372	KY	Gallatin Steel Co.	East Kentucky Power Cooperative, Inc., Big Sandy Recc, et al.	Environmental cost recovery, qualified costs, TIER requirements, cost allocation.
01/05	30485	TX PUCT	Houston Council for Health and Education	CenterPoint Energy Houston Electric, LLC	Stranded cost true-up including regulatory Central Co. assets and liabilities, ITC, EDIT, capacity auction, proceeds, excess mitigation credits, retrospective and prospective ADIT.
02/05	18638-U	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Revenue requirements.
02/05	18638-U Panel with Tony Wackerly	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Comprehensive rate plan, pipeline replacement program surcharge, performance based rate plan.
02/05	18638-U Panel with Michelle Thebert	GA	Georgia Public Service Commission Adversary Staff	Atlanta Gas Light Co.	Energy conservation, economic development, and tariff issues.
03/05	Case Nos. 2004-00426, 2004-00421	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric	Environmental cost recovery, Jobs Creation Act of 2004 and §199 deduction, excess common equity ratio, deferral and amortization of nonrecurring O&M expense.
06/05	2005-00068	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	Environmental cost recovery, Jobs Creation Act of 2004 and §199 deduction, margins on allowances used for AEP system sales.
06/05	050045-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Co.	Storm damage expense and reserve, RTO costs, O&M expense projections, return on equity performance incentive, capital structure, selective second phase post-test year rate increase.
08/05	31056	TX PUCT	Alliance for Valley Healthcare	AEP Texas Central Co.	Stranded cost true-up including regulatory assets and liabilities, ITC, EDIT, capacity auction, proceeds, excess mitigation credits, retrospective and prospective ADIT.
09/05	20298-U	GA	Georgia Public Service Commission Adversary Staff	Atmos Energy Corp.	Revenue requirements, roll-in of surcharges, cost recovery through surcharge, reporting requirements.

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09/05	20298-U Panel with Victoria Taylor	GA	Georgia Public Service Commission Adversary Staff	Atmos Energy Corp.	Affiliate transactions, cost allocations, capitalization, cost of debt.
10/05	04-42	DE	Delaware Public Service Commission Staff	Artesian Water Co.	Allocation of tax net operating losses between regulated and unregulated.
11/05	2005-00351 2005-00352	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric	Workforce Separation Program cost recovery and shared savings through VDT surcredit.
01/06	2005-00341	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Co.	System Sales Clause Rider, Environmental Cost Recovery Rider, Net Congestion Rider, Storm damage, vegetation management program, depreciation, off-system sales, maintenance normalization, pension and OPEB.
03/06	PUC Docket 31994	TX PUCT	Cities	Texas-New Mexico Power Co.	Stranded cost recovery through competition transition or change.
05/06	31994 Supplemental	TX PUCT	Cities	Texas-New Mexico Power Co.	Retrospective ADFIT, prospective ADFIT.
03/06	U-21453, U-20925, U-22092 (Subdocket B)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Jurisdictional separation plan.
03/06	NOPR Reg 104385-OR	IRS	Alliance for Valley Health Care and Houston Council for Health Education	AEP Texas Central Company and CenterPoint Energy Houston Electric	Proposed Regulations affecting flow- through to ratepayers of excess deferred income taxes and investment tax credits on generation plant that is sold or deregulated.
04/06	U-25116	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, Inc.	2002-2004 Audit of Fuel Adjustment Clause Filings. Affiliate transactions.
07/06	R-00061366, Et. al.	PA	Met-Ed Ind. Users Group Pennsylvania Ind. Customer Alliance	Metropolitan Edison Co., Pennsylvania Electric Co.	Recovery of NUG-related stranded costs, government mandated program costs, storm damage costs.
07/06	U-23327	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Co.	Revenue requirements, formula rate plan, banking proposal.
08/06	U-21453, U-20925, U-22092 (Subdocket J)	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc.	Jurisdictional separation plan.
11/06	05CVH03-3375 Franklin County Court Affidavit	OH	Various Taxing Authorities (Non-Utility Proceeding)	State of Ohio Department of Revenue	Accounting for nuclear fuel assemblies as manufactured equipment and capitalized plant.
12/06	U-23327 Subdocket A Reply Testimony	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Co.	Revenue requirements, formula rate plan, banking proposal.

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Date	Case	Jurisdct.	Party	Utility	Subject
03/07	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc., Entergy Louisiana, LLC	Jurisdictional allocation of Entergy System Agreement equalization remedy receipts.
03/07	PUC Docket 33309	TX PUCT	Cities	AEP Texas Central Co.	Revenue requirements, including functionalization of transmission and distribution costs.
03/07	PUC Docket 33310	TX PUCT	Cities	AEP Texas North Co.	Revenue requirements, including functionalization of transmission and distribution costs.
03/07	2006-00472	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative	Interim rate increase, RUS loan covenants, credit facility requirements, financial condition.
03/07	U-29157	LA	Louisiana Public Service Commission Staff	Cleco Power, LLC	Permanent (Phase II) storm damage cost recovery.
04/07	U-29764 Supplemental and Rebuttal	LA	Louisiana Public Service Commission Staff	Entergy Gulf States, Inc., Entergy Louisiana, LLC	Jurisdictional allocation of Entergy System Agreement equalization remedy receipts.
04/07	ER07-682-000 Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Allocation of intangible and general plant and A&G expenses to production and state income tax effects on equalization remedy receipts.
04/07	ER07-684-000 Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Fuel hedging costs and compliance with FERC USOA.
05/07	ER07-682-000 Supplemental Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Allocation of intangible and general plant and A&G expenses to production and account 924 effects on MSS-3 equalization remedy payments and receipts.
06/07	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, LLC, Entergy Gulf States, Inc.	Show cause for violating LPSC Order on fuel hedging costs.
07/07	2006-00472	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative	Revenue requirements, post-test year adjustments, TIER, surcharge revenues and costs, financial need.
07/07	ER07-956-000 Affidavit	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Storm damage costs related to Hurricanes Katrina and Rita and effects of MSS-3 equalization payments and receipts.
10/07	05-UR-103 Direct	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company, Wisconsin Gas, LLC	Revenue requirements, carrying charges on CWIP, amortization and return on regulatory assets, working capital, incentive compensation, use of rate base in lieu of capitalization, quantification and use of Point Beach sale proceeds.
10/07	05-UR-103 Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company, Wisconsin Gas, LLC	Revenue requirements, carrying charges on CWIP, amortization and return on regulatory assets, working capital, incentive compensation, use of rate base in lieu of capitalization, quantification and use of Point Beach sale proceeds.

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Date	Case	Jurisdict.	Party	Utility	Subject
10/07	25060-U Direct	GA	Georgia Public Service Commission Public Interest Adversary Staff	Georgia Power Company	Affiliate costs, incentive compensation, consolidated income taxes, §199 deduction.
11/07	06-0033-E-CN Direct	WV	West Virginia Energy Users Group	Appalachian Power Company	IGCC surcharge during construction period and post-in-service date.
11/07	ER07-682-000 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization and allocation of intangible and general plant and A&G expenses.
01/08	ER07-682-000 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization and allocation of intangible and general plant and A&G expenses.
01/08	07-551-EL-AIR Direct	OH	Ohio Energy Group, Inc.	Ohio Edison Company, Cleveland Electric Illuminating Company, Toledo Edison Company	Revenue requirements.
02/08	ER07-956-000 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization of expenses, storm damage expense and reserves, tax NOL carrybacks in accounts, ADIT, nuclear service lives and effects on depreciation and decommissioning.
03/08	ER07-956-000 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and the Entergy Operating Companies	Functionalization of expenses, storm damage expense and reserves, tax NOL carrybacks in accounts, ADIT, nuclear service lives and effects on depreciation and decommissioning.
04/08	2007-00562, 2007-00563	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas and Electric Co.	Merger surcredit.
04/08	26837 Direct Bond, Johnson, Thebert, Kollen Panel	GA	Georgia Public Service Commission Staff	SCANA Energy Marketing, Inc.	Rule Nisi complaint.
05/08	26837 Rebuttal Bond, Johnson, Thebert, Kollen Panel	GA	Georgia Public Service Commission Staff	SCANA Energy Marketing, Inc.	Rule Nisi complaint.
05/08	26837 Suppl Rebuttal Bond, Johnson, Thebert, Kollen Panel	GA	Georgia Public Service Commission Staff	SCANA Energy Marketing, Inc.	Rule Nisi complaint.

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Date	Case	Jurisdct.	Party	Utility	Subject
06/08	2008-00115	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative, Inc.	Environmental surcharge recoveries, including costs recovered in existing rates, TIER.
07/08	27163 Direct	GA	Georgia Public Service Commission Public Interest Advocacy Staff	Atmos Energy Corp.	Revenue requirements, including projected test year rate base and expenses.
07/08	27163 Taylor, Kollen Panel	GA	Georgia Public Service Commission Public Interest Advocacy Staff	Atmos Energy Corp.	Affiliate transactions and division cost allocations, capital structure, cost of debt.
08/08	6680-CE-170 Direct	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	Nelson Dewey 3 or Colombia 3 fixed financial parameters.
08/08	6680-UR-116 Direct	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	CWIP in rate base, labor expenses, pension expense, financing, capital structure, decoupling.
08/08	6680-UR-116 Rebuttal	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	Capital structure.
08/08	6690-UR-119 Direct	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Public Service Corp.	Prudence of Weston 3 outage, incentive compensation, Crane Creek Wind Farm incremental revenue requirement, capital structure.
09/08	6690-UR-119 Surrebuttal	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Public Service Corp.	Prudence of Weston 3 outage, Section 199 deduction.
09/08	08-935-EL-SSO, 08-918-EL-SSO	OH	Ohio Energy Group, Inc.	First Energy	Standard service offer rates pursuant to electric security plan, significantly excessive earnings test.
10/08	08-917-EL-SSO	OH	Ohio Energy Group, Inc.	AEP	Standard service offer rates pursuant to electric security plan, significantly excessive earnings test.
10/08	2007-00564, 2007-00565, 2008-00251 2008-00252	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Co., Kentucky Utilities Company	Revenue forecast, affiliate costs, ELG v ASL depreciation procedures, depreciation expenses, federal and state income tax expense, capitalization, cost of debt.
11/08	EL08-51	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Spindletop gas storage facilities, regulatory asset and bandwidth remedy.
11/08	35717	TX PUCT	Cities Served by Oncor Delivery Company	Oncor Delivery Company	Recovery of old meter costs, asset ADFIT, cash working capital, recovery of prior year restructuring costs, levelized recovery of storm damage costs, prospective storm damage accrual, consolidated tax savings adjustment.
12/08	27800	GA	Georgia Public Service Commission	Georgia Power Company	AFUDC versus CWIP in rate base, mirror CWIP, certification cost, use of short term debt and trust preferred financing, CWIP recovery, regulatory incentive.
01/09	ER08-1056	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy System Agreement bandwidth remedy calculations, including depreciation expense, ADIT, capital structure.

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01/09	ER08-1056 Supplemental Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Blytheville leased turbines; accumulated depreciation.
02/09	EL08-51 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Spindletop gas storage facilities regulatory asset and bandwidth remedy.
02/09	2008-00409 Direct	KY	Kentucky Industrial Utility Customers, Inc.	East Kentucky Power Cooperative, Inc.	Revenue requirements.
03/09	ER08-1056 Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy System Agreement bandwidth remedy calculations, including depreciation expense, ADIT, capital structure.
03/09	U-21453, U-20925 U-22092 (Sub J) Direct	LA	Louisiana Public Service Commission Staff	Entergy Gulf States Louisiana, LLC	Violation of EGSI separation order, ETI and EGSL separation accounting, Spindletop regulatory asset.
04/09	Rebuttal				
04/09	2009-00040 Direct-Interim (Oral)	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Emergency interim rate increase; cash requirements.
04/09	PUC Docket 36530	TX PUCT	State Office of Administrative Hearings	Oncor Electric Delivery Company, LLC	Rate case expenses.
05/09	ER08-1056 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy System Agreement bandwidth remedy calculations, including depreciation expense, ADIT, capital structure.
06/09	2009-00040 Direct- Permanent	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Revenue requirements, TIER, cash flow.
07/09	080677-EI	FL	South Florida Hospital and Healthcare Association	Florida Power & Light Company	Multiple test years, GBRA rider, forecast assumptions, revenue requirement, O&M expense, depreciation expense, Economic Stimulus Bill, capital structure.
08/09	U-21453, U- 20925, U-22092 (Subdocket J) Supplemental Rebuttal	LA	Louisiana Public Service Commission	Entergy Gulf States Louisiana, LLC	Violation of EGSI separation order, ETI and EGSL separation accounting, Spindletop regulatory asset.
08/09	8516 and 29950	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Company	Modification of PRP surcharge to include infrastructure costs.
09/09	05-UR-104 Direct and Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company	Revenue requirements, incentive compensation, depreciation, deferral mitigation, capital structure, cost of debt.

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09/09	09AL-299E Answer	CO	CF&I Steel, Rocky Mountain Steel Mills LP, Climax Molybdenum Company	Public Service Company of Colorado	Forecasted test year, historic test year, proforma adjustments for major plant additions, tax depreciation.
09/09	6680-UR-117 Direct and Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Power and Light Company	Revenue requirements, CWIP in rate base, deferral mitigation, payroll, capacity shutdowns, regulatory assets, rate of return.
10/09	09A-415E Answer	CO	Cripple Creek & Victor Gold Mining Company, et al.	Black Hills/CO Electric Utility Company	Cost prudence, cost sharing mechanism.
10/09	EL09-50 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 sale/leaseback accumulated deferred income taxes, Entergy System Agreement bandwidth remedy calculations.
10/09	2009-00329	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Company, Kentucky Utilities Company	Trimble County 2 depreciation rates.
12/09	PUE-2009-00030	VA	Old Dominion Committee for Fair Utility Rates	Appalachian Power Company	Return on equity incentive.
12/09	ER09-1224 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Hypothetical versus actual costs, out of period costs, Spindletop deferred capital costs, Waterford 3 sale/leaseback ADIT.
01/10	ER09-1224 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Hypothetical versus actual costs, out of period costs, Spindletop deferred capital costs, Waterford 3 sale/leaseback ADIT.
01/10	EL09-50 Rebuttal Supplemental Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 sale/leaseback accumulated deferred income taxes, Entergy System Agreement bandwidth remedy calculations.
02/10	ER09-1224 Final	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Hypothetical versus actual costs, out of period costs, Spindletop deferred capital costs, Waterford 3 sale/leaseback ADIT.
02/10	30442 Wackerly-Kollen Panel	GA	Georgia Public Service Commission Staff	Atmos Energy Corporation	Revenue requirement issues.
02/10	30442 McBride-Kollen Panel	GA	Georgia Public Service Commission Staff	Atmos Energy Corporation	Affiliate/division transactions, cost allocation, capital structure.
02/10	2009-00353	KY	Kentucky Industrial Utility Customers, Inc., Attorney General	Louisville Gas and Electric Company, Kentucky Utilities Company	Ratemaking recovery of wind power purchased power agreements.
03/10	2009-00545	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Ratemaking recovery of wind power purchased power agreement.

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03/10	E015/GR-09-1151	MN	Large Power Interveners	Minnesota Power	Revenue requirement issues, cost overruns on environmental retrofit project.
04/10	2009-00459	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Revenue requirement issues.
04/10	2009-00548, 2009-00549	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company, Louisville Gas and Electric Company	Revenue requirement issues.
08/10	31647	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Company	Revenue requirement and synergy savings issues.
08/10	31647 Wackerly-Kollen Panel	GA	Georgia Public Service Commission Staff	Atlanta Gas Light Company	Affiliate transaction and Customer First program issues.
08/10	2010-00204	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Company, Kentucky Utilities Company	PPL acquisition of E.ON U.S. (LG&E and KU) conditions, acquisition savings, sharing deferral mechanism.
09/10	38339 Direct and Cross-Rebuttal	TX PUCT	Gulf Coast Coalition of Cities	CenterPoint Energy Houston Electric	Revenue requirement issues, including consolidated tax savings adjustment, incentive compensation FIN 48; AMS surcharge including roll-in to base rates; rate case expenses.
09/10	EL10-55	FERC	Louisiana Public Service Commission	Entergy Services, Inc., Entergy Operating Cos	Depreciation rates and expense input effects on System Agreement tariffs.
09/10	2010-00167	KY	Gallatin Steel	East Kentucky Power Cooperative, Inc.	Revenue requirements.
09/10	U-23327 Subdocket E Direct	LA	Louisiana Public Service Commission	SWEPSCO	Fuel audit: S02 allowance expense, variable O&M expense, off-system sales margin sharing.
11/10	U-23327 Rebuttal	LA	Louisiana Public Service Commission	SWEPSCO	Fuel audit: S02 allowance expense, variable O&M expense, off-system sales margin sharing.
09/10	U-31351	LA	Louisiana Public Service Commission Staff	SWEPSCO and Valley Electric Membership Cooperative	Sale of Valley assets to SWEPSCO and dissolution of Valley.
10/10	10-1261-EL-UNC	OH	Ohio OCC, Ohio Manufacturers Association, Ohio Energy Group, Ohio Hospital Association, Appalachian Peace and Justice Network	Columbus Southern Power Company	Significantly excessive earnings test.
10/10	10-0713-E-PC	WV	West Virginia Energy Users Group	Monongahela Power Company, Potomac Edison Power Company	Merger of First Energy and Allegheny Energy.

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Date	Case	Jurisdct.	Party	Utility	Subject
10/10	U-23327 Subdocket F Direct	LA	Louisiana Public Service Commission Staff	SWEPCO	AFUDC adjustments in Formula Rate Plan.
11/10	EL10-55 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc., Entergy Operating Cos	Depreciation rates and expense input effects on System Agreement tariffs.
12/10	ER10-1350 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc. Entergy Operating Cos	Waterford 3 lease amortization, ADIT, and fuel inventory effects on System Agreement tariffs.
01/11	ER10-1350 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc., Entergy Operating Cos	Waterford 3 lease amortization, ADIT, and fuel inventory effects on System Agreement tariffs.
03/11	ER10-2001 Direct	FERC	Louisiana Public Service Commission	Entergy Services, Inc., Entergy Arkansas, Inc.	EAI depreciation rates.
04/11	Cross-Answering				
04/11	U-23327 Subdocket E	LA	Louisiana Public Service Commission Staff	SWEPCO	Settlement, incl resolution of SO2 allowance expense, var O&M expense, sharing of OSS margins.
04/11	38306 Direct	TX PUCT	Cities Served by Texas- New Mexico Power Company	Texas-New Mexico Power Company	AMS deployment plan, AMS Surcharge, rate case expenses.
05/11	Suppl Direct				
05/11	11-0274-E-GI	WV	West Virginia Energy Users Group	Appalachian Power Company, Wheeling Power Company	Deferral recovery phase-in, construction surcharge.
05/11	2011-00036	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Revenue requirements.
06/11	29849	GA	Georgia Public Service Commission Staff	Georgia Power Company	Accounting issues related to Vogtle risk-sharing mechanism.
07/11	ER11-2161 Direct and Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and Entergy Texas, Inc.	ETI depreciation rates; accounting issues.
07/11	PUE-2011-00027	VA	Virginia Committee for Fair Utility Rates	Virginia Electric and Power Company	Return on equity performance incentive.
07/11	11-346-EL-SSO 11-348-EL-SSO 11-349-EL-AAM 11-350-EL-AAM	OH	Ohio Energy Group	AEP-OH	Equity Stabilization Incentive Plan; actual earned returns; ADIT offsets in riders.
08/11	U-23327 Subdocket F Rebuttal	LA	Louisiana Public Service Commission Staff	SWEPCO	Depreciation rates and service lives; AFUDC adjustments.
08/11	05-UR-105	WI	Wisconsin Industrial Energy Group	WE Energies, Inc.	Suspended amortization expenses; revenue requirements.

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Date	Case	Jurisdct.	Party	Utility	Subject
08/11	ER11-2161 Cross-Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc. and Entergy Texas, Inc.	ETI depreciation rates; accounting issues.
09/11	PUC Docket 39504	TX PUCT	Gulf Coast Coalition of Cities	CenterPoint Energy Houston Electric	Investment tax credit, excess deferred income taxes; normalization.
09/11	2011-00161 2011-00162	KY	Kentucky Industrial Utility Consumers, Inc.	Louisville Gas & Electric Company, Kentucky Utilities Company	Environmental requirements and financing.
10/11	11-4571-EL-UNC 11-4572-EL-UNC	OH	Ohio Energy Group	Columbus Southern Power Company, Ohio Power Company	Significantly excessive earnings.
10/11	4220-UR-117 Direct	WI	Wisconsin Industrial Energy Group	Northern States Power-Wisconsin	Nuclear O&M, depreciation.
11/11	4220-UR-117 Surrebuttal	WI	Wisconsin Industrial Energy Group	Northern States Power-Wisconsin	Nuclear O&M, depreciation.
11/11	PUC Docket 39722	TX PUCT	Cities Served by AEP Texas Central Company	AEP Texas Central Company	Investment tax credit, excess deferred income taxes; normalization.
02/12	PUC Docket 40020	TX PUCT	Cities Served by Oncor	Lone Star Transmission, LLC	Temporary rates.
03/12	11AL-947E Answer	CO	Climax Molybdenum Company and CF&I Steel, L.P. d/b/a Evraz Rocky Mountain Steel	Public Service Company of Colorado	Revenue requirements, including historic test year, future test year, CACJA CWIP, contra-AFUDC.
03/12	2011-00401	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Big Sandy 2 environmental retrofits and environmental surcharge recovery.
4/12	2011-00036 Direct Rehearing Supplemental Rebuttal Rehearing	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Rate case expenses, depreciation rates and expense.
04/12	10-2929-EL-UNC	OH	Ohio Energy Group	AEP Ohio Power	State compensation mechanism, CRES capacity charges, Equity Stabilization Mechanism
05/12	11-346-EL-SSO 11-348-EL-SSO	OH	Ohio Energy Group	AEP Ohio Power	State compensation mechanism, Equity Stabilization Mechanism, Retail Stability Rider.
05/12	11-4393-EL-RDR	OH	Ohio Energy Group	Duke Energy Ohio, Inc.	Incentives for over-compliance on EE/PDR mandates.

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Date	Case	Jurisdct.	Party	Utility	Subject
06/12	40020	TX PUCT	Cities Served by Oncor	Lone Star Transmission, LLC	Revenue requirements, including ADIT, bonus depreciation and NOL, working capital, self insurance, depreciation rates, federal income tax expense.
07/12	120015-EI	FL	South Florida Hospital and Healthcare Association	Florida Power & Light Company	Revenue requirements, including vegetation management, nuclear outage expense, cash working capital, CWIP in rate base.
07/12	2012-00063	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corp.	Environmental retrofits, including environmental surcharge recovery.
09/12	05-UR-106	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Electric Power Company	Section 1603 grants, new solar facility, payroll expenses, cost of debt.
10/12	2012-00221 2012-00222	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas and Electric Company, Kentucky Utilities Company	Revenue requirements, including off-system sales, outage maintenance, storm damage, injuries and damages, depreciation rates and expense.
10/12	120015-EI Direct	FL	South Florida Hospital and Healthcare Association	Florida Power & Light Company	Settlement issues.
11/12	120015-EI Rebuttal	FL	South Florida Hospital and Healthcare Association	Florida Power & Light Company	Settlement issues.
10/12	40604	TX PUCT	Steering Committee of Cities Served by Oncor	Cross Texas Transmission, LLC	Policy and procedural issues, revenue requirements, including AFUDC, ADIT – bonus depreciation & NOL, incentive compensation, staffing, self-insurance, net salvage, depreciation rates and expense, income tax expense.
11/12	40627 Direct	TX PUCT	City of Austin d/b/a Austin Energy	City of Austin d/b/a Austin Energy	Rate case expenses.
12/12	40443	TX PUCT	Cities Served by SWEPCO	Southwestern Electric Power Company	Revenue requirements, including depreciation rates and service lives, O&M expenses, consolidated tax savings, CWIP in rate base, Turk plant costs.
12/12	U-29764	LA	Louisiana Public Service Commission Staff	Entergy Gulf States Louisiana, LLC and Entergy Louisiana, LLC	Termination of purchased power contracts between EGSL and ETI, Spindletop regulatory asset.
01/13	ER12-1384 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Gulf States Louisiana, LLC and Entergy Louisiana, LLC	Little Gypsy 3 cancellation costs.
02/13	40627 Rebuttal	TX PUCT	City of Austin d/b/a Austin Energy	City of Austin d/b/a Austin Energy	Rate case expenses.
03/13	12-426-EL-SSO	OH	The Ohio Energy Group	The Dayton Power and Light Company	Capacity charges under state compensation mechanism, Service Stability Rider, Switching Tracker.

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Date	Case	Jurisdct.	Party	Utility	Subject
04/13	12-2400-EL-UNC	OH	The Ohio Energy Group	Duke Energy Ohio, Inc.	Capacity charges under state compensation mechanism, deferrals, rider to recover deferrals.
04/13	2012-00578	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Resource plan, including acquisition of interest in Mitchell plant.
05/13	2012-00535	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Revenue requirements, excess capacity, restructuring.
06/13	12-3254-EL-UNC	OH	The Ohio Energy Group, Inc., Office of the Ohio Consumers' Counsel	Ohio Power Company	Energy auctions under CBP, including reserve prices.
07/13	2013-00144	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Biomass renewable energy purchase agreement.
07/13	2013-00221	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Agreements to provide Century Hawesville Smelter market access.
10/13	2013-00199	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Revenue requirements, excess capacity, restructuring.
12/13	2013-00413	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Agreements to provide Century Sebree Smelter market access.
01/14	ER10-1350 Direct and Answering	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 lease accounting and treatment in annual bandwidth filings.
02/14	U-32981	LA	Louisiana Public Service Commission	Entergy Louisiana, LLC	Montauk renewable energy PPA.
04/14	ER13-432 Direct	FERC	Louisiana Public Service Commission	Entergy Gulf States Louisiana, LLC and Entergy Louisiana, LLC	Union Pacific Settlement benefits and damages.
05/14	PUE-2013-00132	VA	HP Hood LLC	Shenandoah Valley Electric Cooperative	Market based rate; load control tariffs.
07/14	PUE-2014-00033	VA	Virginia Committee for Fair Utility Rates	Virginia Electric and Power Company	Fuel and purchased power hedge accounting, change in FAC Definitional Framework.
08/14	ER13-432 Rebuttal	FERC	Louisiana Public Service Commission	Entergy Gulf States Louisiana, LLC and Entergy Louisiana, LLC	Union Pacific Settlement benefits and damages.
08/14	2014-00134	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Requirements power sales agreements with Nebraska entities.
09/14	E-015/CN-12-1163 Direct	MN	Large Power Intervenors	Minnesota Power	Great Northern Transmission Line; cost cap; AFUDC v. current recovery; rider v. base recovery; class cost allocation.
10/14	2014-00225	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Allocation of fuel costs to off-system sales.

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10/14	ER13-1508	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Entergy service agreements and tariffs for affiliate power purchases and sales; return on equity.
10/14	14-0702-E-42T 14-0701-E-D	WV	West Virginia Energy Users Group	First Energy-Monongahela Power, Potomac Edison	Consolidated tax savings; payroll; pension, OPEB, amortization; depreciation; environmental surcharge.
11/14	E-015/CN-12-1163 Surrebuttal	MN	Large Power Intervenors	Minnesota Power	Great Northern Transmission Line; cost cap; AFUDC v. current recovery; rider v. base recovery; class allocation.
11/14	05-376-EL-UNC	OH	Ohio Energy Group	Ohio Power Company	Refund of IGCC CWIP financing cost recoveries.
11/14	14AL-0660E	CO	Climax, CF&I Steel	Public Service Company of Colorado	Historic test year v. future test year; AFUDC v. current return; CACJA rider, transmission rider; equivalent availability rider; ADIT; depreciation; royalty income; amortization.
12/14	EL14-026	SD	Black Hills Industrial Intervenors	Black Hills Power Company	Revenue requirement issues, including depreciation expense and affiliate charges.
12/14	14-1152-E-42T	WV	West Virginia Energy Users Group	AEP-Appalachian Power Company	Income taxes, payroll, pension, OPEB, deferred costs and write offs, depreciation rates, environmental projects surcharge.
01/15	9400-YO-100 Direct	WI	Wisconsin Industrial Energy Group	Wisconsin Energy Corporation	WEC acquisition of Integrys Energy Group, Inc.
01/15	14F-0336EG 14F-0404EG	CO	Development Recovery Company LLC	Public Service Company of Colorado	Line extension policies and refunds.
02/15	9400-YO-100 Rebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Energy Corporation	WEC acquisition of Integrys Energy Group, Inc.
03/15	2014-00396	KY	Kentucky Industrial Utility Customers, Inc.	AEP-Kentucky Power Company	Base, Big Sandy 2 retirement rider, environmental surcharge, and Big Sandy 1 operation rider revenue requirements, depreciation rates, financing, deferrals.
03/15	2014-00371 2014-00372	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company and Louisville Gas and Electric Company	Revenue requirements, staffing and payroll, depreciation rates.
04/15	2014-00450	KY	Kentucky Industrial Utility Customers, Inc. and the Attorney General of the Commonwealth of Kentucky	AEP-Kentucky Power Company	Allocation of fuel costs between native load and off-system sales.
04/15	2014-00455	KY	Kentucky Industrial Utility Customers, Inc. and the Attorney General of the Commonwealth of Kentucky	Big Rivers Electric Corporation	Allocation of fuel costs between native load and off-system sales.

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04/15	ER2014-0370	MO	Midwest Energy Consumers' Group	Kansas City Power & Light Company	Affiliate transactions, operation and maintenance expense, management audit.
05/15	PUE-2015-00022	VA	Virginia Committee for Fair Utility Rates	Virginia Electric and Power Company	Fuel and purchased power hedge accounting; change in FAC Definitional Framework.
05/15 09/15	EL10-65 Direct, Rebuttal Complaint	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Accounting for AFUDC Debt, related ADIT.
07/15	EL10-65 Direct and Answering Consolidated Bandwidth Dockets	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Waterford 3 sale/leaseback ADIT, Bandwidth Formula.
09/15	14-1693-EL-RDR	OH	Public Utilities Commission of Ohio	Ohio Energy Group	PPA rider for charges or credits for physical hedges against market.
12/15	45188	TX PUCT	Cities Served by Oncor Electric Delivery Company	Oncor Electric Delivery Company	Hunt family acquisition of Oncor; transaction structure; income tax savings from real estate investment trust (REIT) structure; conditions.
12/15 01/16	6680-CE-176 Direct, Surrebuttal, Supplemental Rebuttal	WI	Wisconsin Industrial Energy Group, Inc.	Wisconsin Power and Light Company	Need for capacity and economics of proposed Riverside Energy Center Expansion project; ratemaking conditions.
03/16 03/16 04/16 05/16 06/16	EL01-88 Remand Direct Answering Cross-Answering Rebuttal	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Bandwidth Formula: Capital structure, fuel inventory, Waterford 3 sale/leaseback, Vidalia purchased power, ADIT, Blythesville, Spindletop, River Bend AFUDC, property insurance reserve, nuclear depreciation expense.
03/16	15-1673-E-T	WV	West Virginia Energy Users Group	Appalachian Power Company	Terms and conditions of utility service for commercial and industrial customers, including security deposits.
04/16	39971 Panel Direct	GA	Georgia Public Service Commission Staff	Southern Company, AGL Resources, Georgia Power Company, Atlanta Gas Light Company	Southern Company acquisition of AGL Resources, risks, opportunities, quantification of savings, ratemaking implications, conditions, settlement.
04/16	2015-00343	KY	Office of the Attorney General	Atmos Energy Corporation	Revenue requirements, including NOL ADIT, affiliate transactions.
04/16	2016-00070	KY	Office of the Attorney General	Atmos Energy Corporation	R & D Rider.

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05/16	2016-00026 2016-00027	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Co., Louisville Gas & Electric Co.	Need for environmental projects, calculation of environmental surcharge rider.
05/16	16-G-0058 16-G-0059	NY	New York City	Keyspan Gas East Corp., Brooklyn Union Gas Company	Depreciation, including excess reserves, leak prone pipe.
06/16	160088-EI	FL	South Florida Hospital and Healthcare Association	Florida Power and Light Company	Fuel Adjustment Clause Incentive Mechanism re: economy sales and purchases, asset optimization.
07/16	160021-EI	FL	South Florida Hospital and Healthcare Association	Florida Power and Light Company	Revenue requirements, including capital recovery, depreciation, ADIT.
07/16	16-057-01	UT	Office of Consumer Services	Dominion Resources, Inc. / Questar Corporation	Merger, risks, harms, benefits, accounting.
08/16	15-1022-EL-UNC 16-1105-EL-UNC	OH	Ohio Energy Group	AEP Ohio Power Company	SEET earnings, effects of other pending proceedings.
9/16	2016-00162	KY	Office of the Attorney General	Columbia Gas Kentucky	Revenue requirements, O&M expense, depreciation, affiliate transactions.
09/16	E-22 Sub 519, 532, 533	NC	Nucor Steel	Dominion North Carolina Power Company	Revenue requirements, deferrals and amortizations.
09/16	15-1256-G-390P (Reopened) 16-0922-G-390P	WV	West Virginia Energy Users Group	Mountaineer Gas Company	Infrastructure rider, including NOL ADIT and other income tax normalization and calculation issues.
10/16	10-2929-EL-UNC 11-346-EL-SSO 11-348-EL-SSO 11-349-EL-SSO 11-350-EL-SSO 14-1186-EL-RDR	OH	Ohio Energy Group	AEP Ohio Power Company	State compensation mechanism, capacity cost, Retail Stability Rider deferrals, refunds, SEET.
11/16	16-0395-EL-SSO Direct	OH	Ohio Energy Group	Dayton Power & Light Company	Credit support and other riders; financial stability of Utility, holding company.
12/16	Formal Case 1139	DC	Healthcare Council of the National Capital Area	Potomac Electric Power Company	Post test year adjust, merger costs, NOL ADIT, incentive compensation, rent.
01/17	46238	TX PUCT	Steering Committee of Cities Served by Oncor	Oncor Electric Delivery Company	Next Era acquisition of Oncor; goodwill, transaction costs, transition costs, cost deferrals, ratemaking issues.
02/17	16-0395-EL-SSO Direct (Stipulation)	OH	Ohio Energy Group	Dayton Power & Light Company	Non-unanimous stipulation re: credit support and other riders; financial stability of utility, holding company.
02/17	45414	TX PUCT	Cities of Midland, McAllen, and Colorado City	Sharyland Utilities, LP, Sharyland Distribution & Transmission Services, LLC	Income taxes, depreciation, deferred costs, affiliate expenses.

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Date	Case	Jurisdct.	Party	Utility	Subject
03/17	2016-00370 2016-00371	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company, Louisville Gas and Electric Company	AMS, capital expenditures, maintenance expense, amortization expense, depreciation rates and expense.
06/17	29849 (Panel with Philip Hayet)	GA	Georgia Public Service Commission Staff	Georgia Power Company	Vogtle 3 and 4 economics.
08/17	17-0296-E-PC	WV	West Virginia Energy Users Group	Monongahela Power Company, The Potomac Edison Power Company	ADIT, OPEB.
10/17	2017-00179	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Weather normalization, Rockport lease, O&M, incentive compensation, depreciation, income taxes.
10/17	2017-00287	KY	Kentucky Industrial Utility Customers, Inc.	Big Rivers Electric Corporation	Fuel cost allocation to native load customers.
12/17	2017-00321	KY	Attorney General	Duke Energy Kentucky (Electric)	Revenues, depreciation, income taxes, O&M, regulatory assets, environmental surcharge rider, FERC transmission cost reconciliation rider.
12/17	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	Vogtle 3 and 4 economics, tax abandonment loss.
01/18	2017-00349	KY	Kentucky Attorney General	Atmos Energy Kentucky	O&M expense, depreciation, regulatory assets and amortization, Annual Review Mechanism, Pipeline Replacement Program and Rider, affiliate expenses.
06/18	18-0047	OH	Ohio Energy Group	Ohio Electric Utilities	Tax Cuts and Jobs Act. Reduction in income tax expense; amortization of excess ADIT.
07/18	T-34695	LA	LPSC Staff	Crimson Gulf, LLC	Revenues, depreciation, income taxes, O&M, ADIT.
08/18	48325	TX PUCT	Cities Served by Oncor	Oncor Electric Delivery Company	Tax Cuts and Jobs Act; amortization of excess ADIT.
08/18	48401	TX PUCT	Cities Served by TNMP	Texas-New Mexico Power Company	Revenues, payroll, income taxes, amortization of excess ADIT, capital structure.
08/18	2018-00146	KY	KIUC	Big Rivers Electric Corporation	Station Two contracts termination, regulatory asset, regulatory liability for savings
09/18	20170235-EI 20170236-EU	FL	Office of Public Counsel	Florida Power & Light Company	FP&L acquisition of City of Vero Beach municipal electric utility systems.
10/18	Direct Supplemental Direct				

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Date	Case	Jurisdct.	Party	Utility	Subject
09/18	2017-370-E Direct	SC	Office of Regulatory Staff	South Carolina Electric & Gas Company and Dominion Energy, Inc.	Recovery of Summer 2 and 3 new nuclear development costs, related regulatory liabilities, securitization, NOL carryforward and ADIT, TCJA savings, merger conditions and savings.
10/18	2017-207, 305, 370-E Surrebuttal Supplemental Surrebuttal				
12/18	2018-00261	KY	Attorney General	Duke Energy Kentucky (Gas)	Revenues, O&M, regulatory assets, payroll, integrity management, incentive compensation, cash working capital.
01/19	2018-00294 2018-00295	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company, Louisville Gas & Electric Company	AFUDC v. CWIP in rate base, transmission and distribution plant additions, capitalization, revenues generation outage expense, depreciation rates and expenses, cost of debt.
01/19	2018-00281	KY	Attorney General	Atmos Energy Corp.	AFUDC v. CWIP in rate base, ALG v. ELG depreciation rates, cash working capital, PRP Rider, forecast plant additions, forecast expenses, cost of debt, corporate cost allocation.
02/19	UD-18-07 Direct	New Orleans	Crescent City Power Users Group	Entergy New Orleans, LLC	Post-test year adjustments, storm reserve fund, NOL ADIT, FIN48 ADIT, cash working capital, depreciation, amortization, capital structure, formula rate plans, purchased power rider.
04/19	Surrebuttal and Cross-Answering				
03/19	2018-00358	KY	Attorney General	Kentucky American Water Company	Capital expenditures, cash working capital, payroll expense, incentive compensation, chemicals expense, electricity expense, water losses, rate case expense, excess deferred income taxes.
03/19	48929	TX PUCT	Steering Committee of Cities Served by Oncor	Oncor Electric Delivery Company LLC, Sempra Energy, Sharyland Distribution & Transmission Services, L.L.C., Sharyland Utilities, L.P.	Sale, transfer, merger transactions, hold harmless and other regulatory conditions.
06/19	49421	TX PUCT	Gulf Coast Coalition of Cities	CenterPoint Energy Houston Electric	Prepaid pension asset, accrued OPEB liability, regulatory assets and liabilities, merger savings, storm damage expense, excess deferred income taxes.
07/19	49494	TX PUCT	Cities Served by AEP Texas	AEP Texas, Inc.	Plant in service, prepaid pension asset, O&M, ROW costs, incentive compensation, self-insurance expense, excess deferred income taxes.
08/19	19-G-0309 19-G-0310	NY	New York City	National Grid	Depreciation rates, net negative salvage.

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10/19	42315	GA	Atlanta Gas Light Company	Public Interest Advocacy Staff	Capital expenditures, O&M expense, prepaid pension asset, incentive compensation, merger savings, affiliate expenses, excess deferred income taxes.
10/19	45253	IN	Duke Energy Indiana	Office of Utility Consumer Counselor	Prepaid pension asset, inventories, regulatory assets and liabilities, unbilled revenues, incentive compensation, income tax expense, affiliate charges, ADIT, riders.
12/19	2019-00271	KY	Attorney General	Duke Energy Kentucky	ADIT, EDIT, CWC, payroll expense, incentive compensation expense, depreciation rates, pilot programs
05/20	202000067-EI	FL	Office of Public Counsel	Tampa Electric Company	Storm Protection Plan.
06/20	20190038-EI	FL	Office of Public Counsel	Gulf Power Company	Hurricane Michael costs.
07/20	PUR-2020-00015	VA	Old Dominion Committee for Fair Utility Rates	Appalachian Power Company	Coal Amortization Rider, storm damage, prepaid pension and OPEB assets, return on joint-use assets.
09/20	Direct Surrebuttal				
07/20	2019-226-E	SC	Office of Regulatory Staff	Dominion Energy South Carolina	Integrated Resource Plan.
09/20	Direct Surrebuttal				
10/20	2020-00160	KY	Attorney General	Water Service Corporation of Kentucky	Return on rate base v. operating ratio.
10/20	2020-00174	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Rate base v. capitalization, Rockport UPA, prepaid pension and OPEB, cash working capital, incentive compensation, Rockport 2 depreciation expense, EDIT, AML, grid modernization rider.
11/20	2020-125-E	SC	Office of Regulatory Staff	Dominion Energy South Carolina	Summer 2 and 3 cancelled plant and transmission cost recovery; TCJA; regulatory assets.
12/20	Direct Surrebuttal				
12/20	2020172-EI	FL	Office of Public Counsel	Florida Power & Light Company	Hurricane Dorian costs.
12/20	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	VCM23, Vogtle 3 and 4 rate impact analyses.
02/21	2019-224-E	SC	Office of Regulatory Staff	Duke Energy Carolinas, LLC, Duke Energy Progress, LLC	Integrated Resource Plans.
04/21	2019-225-E Direct Surrebuttal				
03/21	51611	TX PUCT	Steering Committee of Cities Served by Oncor	Sharyland Utilities, L.L.C.	ADIT, capital structure, return on equity.

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03/21	2020-00349 2020-00350	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company and Louisville Gas and Electric Company	Rate base v. capitalization, retired plant costs, depreciation, securitization, staffing + payroll, pension + OPEB, AML, off-system sales margins.
04/21 Direct	18-857-EL-UNC 19-1338-EL-UNC 20-1034-EL-UNC 20-1476-EL-UNC	OH	The Ohio Energy Group	First Energy Ohio Companies	Significantly Excessive Earnings Test; legacy nuclear plant costs.
07/21	Supplemental Direct				
05/21	2021-00004 Direct	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	CPCN for CCR/ELG Projects at Mitchell Plant.
06/21	Supplemental Direct				
06/21	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	VCM24, Vogtle 3 and 4 rate impact analyses.
06/21	2021-00103	KY	Attorney General and Nucor Steel Gallatin	East Kentucky Power Cooperative, Inc.	Revenues, depreciation, interest, TIER, O&M, regulatory asset.
07/21	U-35441 Direct	LA	Louisiana Public Service Commission Staff	Southwestern Electric Power Company	Revenues, O&M expense, depreciation, retirement rider.
08/21 10/21	Cross-Answering Surrebuttal				
09/21	05-21-00007061	TX RRCT	Texas Cities Alliance	CenterPoint, CoServe, Corix, EPCOR, SiEnergy, TGS, UniGas	Securitization; regulatory asset; rates.
09/21	2021-00190	KY	Attorney General	Duke Energy Kentucky	Revenues, O&M expense, depreciation, capital structure, cost of long-term debt, government mandate rider.
09/21	43838	GA	Public Interest Advocacy Staff	Georgia Power Company	Vogtle 3 base rates, NCCR rates; deferrals.
09/21	2021-00214	KY	Attorney General	Atmos Energy Corp.	NOL ADIT, working capital, affiliate expenses, amortization EDIT, capital structure, cost of debt, accelerated replacement Aldyl-A pipe, PRP Rider, Tax Act Adjustment Rider.
12/21	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	VCM25, Vogtle 3 and 4 rate impact analyses.
01/22	2021-00358	KY	Attorney General	Jackson Purchase Energy Corporation	Revenues, nonrecurring expenses, normalized expenses, interest expense, TIER.

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01/22	2021-00421	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Proposed Mitchell Plant Operations and Maintenance and Ownership Agreements; sale of Mitchell Plant interest.
02/22	2021-00481	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Proposed Liberty Utilities, Inc. acquisition of Kentucky Power Company; harm to customers; conditions to mitigate harm.
03/22	2021-00407	KY	Attorney General	South Kentucky Rural Electric Cooperative Corporation	Revenues, interest income, interest expense, TIER, payroll.
03/22	U-36190	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, LLC	Certification of solar resources.
04/22	Direct Cross-Answering				
05/22	20200241-EI 20210078-EI 20210079-EI	FL	Office of Public Counsel	Florida Power & Light Company, Gulf Power Company	Hurricanes Sally, Zeta, Isaias; Tropical Storm Eta, pre-planning, restoration and repair, costs, ratemaking recovery.
05/22	U-36268	LA	Louisiana Public Service Commission Staff	1803 Electric Cooperative, Inc.	Wholesale power contracts, wholesale rate tariffs, wholesale rates.
06/22	20220048-EI 20220049-EI 20220050-EI 20220051-EI	FL	Office of Public Counsel	Tampa Electric Company, Florida Public Utilities Company, Duke Energy Florida, LLC, Florida Power & Light Company	Storm Protection Plans, prudence, reasonableness, cost recovery, including deferred return on CWIP.
06/22	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	VCM26, Vogtle 3 and 4 rate impact analyses.
07/22	S-36267	LA	Louisiana Public Service Commission Staff	1803 Electric Cooperative, Inc.	Non-opposition to establish revolving LOC and supporting guarantees by member cooperatives.
08/22	53601	TX PUCT	Steering Committee of Cities Served by Oncor	Oncor Electric Delivery Company, LLC	Vendor financing, customer advances, cash working capital, ADFIT and temporary differences, depreciation expense, amortization expense.
09/22	20220010-EI	FL	Office of Public Counsel	Tampa Electric Company, Florida Public Utilities Company, Duke Energy Florida, LLC, Florida Power & Light Company	Storm Protection Plan, Cost Recovery Clause, prudence, reasonableness, deferred return on CWIP.
10/22	5-UR-110	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company	Levelized recovery of retired plan costs, securitization financing.
10/22	2022-00283	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Rockport deferrals and recoveries.

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Date	Case	Jurisdct.	Party	Utility	Subject
12/22	2022-00263	KY	Attorney General and Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Fuel adjustment clause methodology and disallowances.
01/23	29849 (Panel with Philip Hayet, Tom Newsome)	GA	Georgia Public Service Commission Staff	Georgia Power Company	VCM27, Vogtle 3 and 4 rate impact analyses.
1/23	2022-256-E Direct	SC	Office of Regulatory Staff	Duke Energy Progress, LLC	Storm response process, costs, deferrals, deferred carrying costs.
02/23	Surrebuttal				
03/23	2022-00372	KY	Attorney General	Duke Energy Kentucky, Inc.	Cash working capital, depreciation, decommissioning, regulatory asset amortization, retired generation asset recovery, modifications to existing tariffs, proposed new tariffs.
06/23	20230023-GU	FL	Office of Public Counsel	Peoples Gas System, Inc.	Restructuring, staffing, O&M expenses, storm expense, depreciation expense, amortization of theoretical depreciation surplus.
07/23	2022-00402	KY	Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company and Louisville Gas and Electric Company	CPCNs for combined cycle and owned solar resources, acquisition of PPA solar resources, retirement of coal resources.
07/23	2023-89-E Direct	SC	Office of Regulatory Staff	Duke Energy Progress, LLC	Securitization financing, quantifiable net benefits, regulatory liability for return on ADIT, financing order and tariff language for calculation of storm recovery charges.
08/23	Surrebuttal				
08/23	U-36685	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, LLC	Certification of solar PPAs and related ratemaking.
09/23	6680-UR-124 Direct Surrebuttal	WI	Wisconsin Industrial Energy Group	Wisconsin Power and Light Company	Ratemaking alternatives for recovery of retired plant costs, including securitization financing.
09/23	05-UR-110 (Reopener) Direct	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company	Ratemaking alternatives for recovery of retired plant costs, including securitization financing.
10/23	29849	GA	Georgia Public Service Commission Staff	Georgia Power Company	Vogtle 3 and 4 prudence.
10/23	2023-00159	KY	Attorney General Kentucky Industrial Utility Customer, Inc.	Kentucky Power Company	NOL, COR, and other ADIT, incentive comp, regulatory assets, transmission and distribution cost riders, CAMT and other IRA, tax costs rider, securitization.

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12/23	2021-00370	KY	Attorney General	Kentucky Power	Investigation into adequacy of service and
02/24	Direct Rebuttal		Kentucky Industrial Utility Customer, Inc.	Company	reasonableness of rates.
02/24	2023-00008	KY	Attorney General, Kentucky Industrial Utility Customesr, Inc.	Kentucky Power Company	Fuel adjustment clause; fuel and purchased power expense; peaking unit equivalent methodology.
03/24	05-23-0015513	TX RRCT	Cities Served by CenterPoint Gas	CenterPoint Energy Resources Corp.	Capital structure, Tax Rider, NOL ADIT, CAMT ADIT, annualize revenues, incentive compensation, vendor financing, customer financing, working capital.
05/24	56165	TX PUCT	Cities Served by AEP Texas	AEP Texas, Inc.	Tax Rider, NOL ADIT, CAMT ADIT, annualize revenues, incentive compensation, vendor financing, customer financing, working capital.
05/24	U-37071	LA	Louisiana Public Service Commission Staff	Entergy Louisiana, LLC	RFP for solar resources; certification of Mondu PPA.
06/24	Direct in Support of Settlement				
06/24	2024-34-E	SC	Office of Regulatory Staff	Dominion Energy South Carolina, Inc.	Working capital, cash working capital.
06/24	20240026-EI	FL	Office of Public Counsel	Tampa Electric Company	O&M expense, A&G expense, incentive compensation, depreciation rates and expenses, dismantlement expense, tax credits, subsequent year adjustments, tax rider.
06/24	56211	TX PUCT	Gulf Coast Coalition of Cities	Centerpoint Energy Houston Electric, LLC	Tax Rider, CAMT ADIT, vendor financing, customer financing, working capital, prepaid pension, regulatory assets, annualize revenues, Texas margin tax.
08/24	5-UR-111	WI	Wisconsin Industrial Energy Group	Wisconsin Electric Power Company	Recovery of retired plant costs; securitization.
09/24	Direct Rebuttal				
09/24	Surrebuttal				
08/24	6690-UR-128	WI	Wisconsin Industrial Energy Group	Wisconsin Public Service Corporation	Recovery of retired plant costs; securitization.
09/24	Direct Rebuttal				
09/24	Surrebuttal				
11/24	2024-00243	KY	Attorney General, Kentucky Industrial Utility Customers, Inc.	Kentucky Power Company	Bright Mountain Solar renewable energy purchase agreement.
12/24	2024-00285	KY	Attorney General	Duke Energy Kentucky, Inc.	Transition from PJM FRR entity to RPM entity; modifications to Rider Profit Sharing Mechanism.
01/25	2024-00276	KY	Attorney General	Atmos Energy Corporation	NOLC DTA, working capital, cash working capital, riders.

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As of June 2025**

Date	Case	Jurisdct.	Party	Utility	Subject
02/25	05-24-00018879	TX (RRCT)	Cities Served by Atmos West Texas	Atmos Energy Corporation	NOLC DTA, other DTAs, DTLs, working capital, riders.
03/25	2024-00354	KY	Attorney General	Duke Energy Kentucky, Inc.	CAMT, working capital, CWC, unbilled revenues, depreciation, decommissioning, credit card fees, capacity performance insurance, new programs and riders.
05/25	2025-65-E	SC	Office of Regulatory Staff	Duke Energy Carolinas	Storm recovery costs, securitization, net benefits, regulatory assets and liabilities.
06/25	Surrebuttal				
06/25	57568	TX	Freeport-McMoRan, Inc.	El Paso Electric Company	Revenue annualization, nuclear decommissioning, depreciation rates, long term debt interest payable.
06/25	2025-00045	KY	Attorney General, Kentucky Industrial Utility Customers, Inc.	Kentucky Utilities Company, Louisville Gas and Electric	CPCN, AFUDC, post in-service deferrals, generation cost recover rider, extremely high factor tariff.

March & April 2025



Investor Presentation



Forward Looking Information, Non-GAAP Measures & Other

FORWARD-LOOKING INFORMATION

This presentation contains “forward-looking information” (“FLI”) and statements which reflect the current view with respect to the Company’s expectations regarding future growth, results of operations, performance, the expected timing and outcome of the pending sale of NMGC, business prospects and opportunities, and may not be appropriate for other purposes within the meaning of applicable Canadian securities laws. All such information and statements are made pursuant to safe harbour provisions contained in applicable securities legislation. The words “anticipates”, “believes”, “budget”, “could”, “estimates”, “expects”, “forecast”, “intends”, “may”, “might”, “plans”, “projects”, “schedule”, “should”, “targets”, “will”, “would” and similar expressions are often intended to identify FLI, although not all FLI contains these identifying words. The FLI reflects management’s current beliefs and is based on information currently available to Emera’s management and should not be read as guarantees of future events, performance or results, and will not necessarily be accurate indications of whether, or the time at which, such events, performance or results will be achieved.

The FLI is based on reasonable assumptions and is subject to risks, uncertainties and other factors that could cause actual results to differ materially from historical results or results anticipated by the FLI. Factors that could cause results or events to differ from current expectations include, without limitation: regulatory and political risk; change in law risk; operating and maintenance risks; changes in economic conditions; commodity price and availability

risk; liquidity and capital market risk; changes in credit ratings; future dividend growth; rate base growth; adjusted earnings per common share (“EPS”) growth; timing and costs associated with certain capital investments; expected impacts on Emera of challenges in the global economy; estimated energy consumption rates; maintenance of adequate insurance coverage; changes in customer energy usage patterns; developments in technology that could reduce demand for electricity; climate change risk; weather risk, including higher frequency and severity of weather events; risk of wildfires; unanticipated maintenance and other expenditures; system operating and maintenance risk; derivative financial instruments and hedging; interest rate risk; inflation risk; counterparty risk; disruption of fuel supply; country risks; supply chain risk; environmental risks; foreign exchange (“FX”); regulatory and government decisions, including changes to environmental legislation, financial reporting and tax legislation; risks associated with pension plan performance and funding requirements; loss of service area; risk of failure of information technology (“IT”) infrastructure and cybersecurity risks; uncertainties associated with infectious diseases, pandemics and similar public health threats; market energy sales prices; labour relations; and availability of labour and management resources.

Readers are cautioned not to place undue reliance on FLI, as actual results could differ materially from the plans, expectations, estimates or intentions and statements expressed in the FLI. All FLI in this presentation is qualified in its entirety by the above cautionary statements and, except as required by law, Emera

undertakes no obligation to revise or update any FLI as a result of new information, future events or otherwise.

NON-GAAP FINANCIAL MEASURES AND RATIOS

Emera uses financial measures and ratios that do not have standardized meaning under USGAAP and may not be comparable to similar measures presented by other entities. Emera calculates the non-GAAP measures and ratios by adjusting certain GAAP measures for specific items. Management believes excluding these items better distinguishes the ongoing operations of the business and allows investors to better understand and evaluate the business. Refer to the “Non-GAAP Financial Measures and Ratios” section of Emera’s Q4 2024 MD&A which is incorporated herein by reference and can be found on SEDAR+ at www.sedarplus.ca. Reconciliation to the nearest GAAP measure is included in the appendix.

OTHER

Rate base is a financial measure specific to rate-regulated utilities that is not intended to represent any financial measure as defined by GAAP. The measure is required by the regulatory authorities in the jurisdictions where Emera’s rate-regulated subsidiaries or equity investments operate, a summary of which can be found in our presentation. The calculation of this measure as presented may not be comparable to similarly titled measures used by other companies.

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**APPENDIX 1:
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Information**
Page 37



About Emera

70%

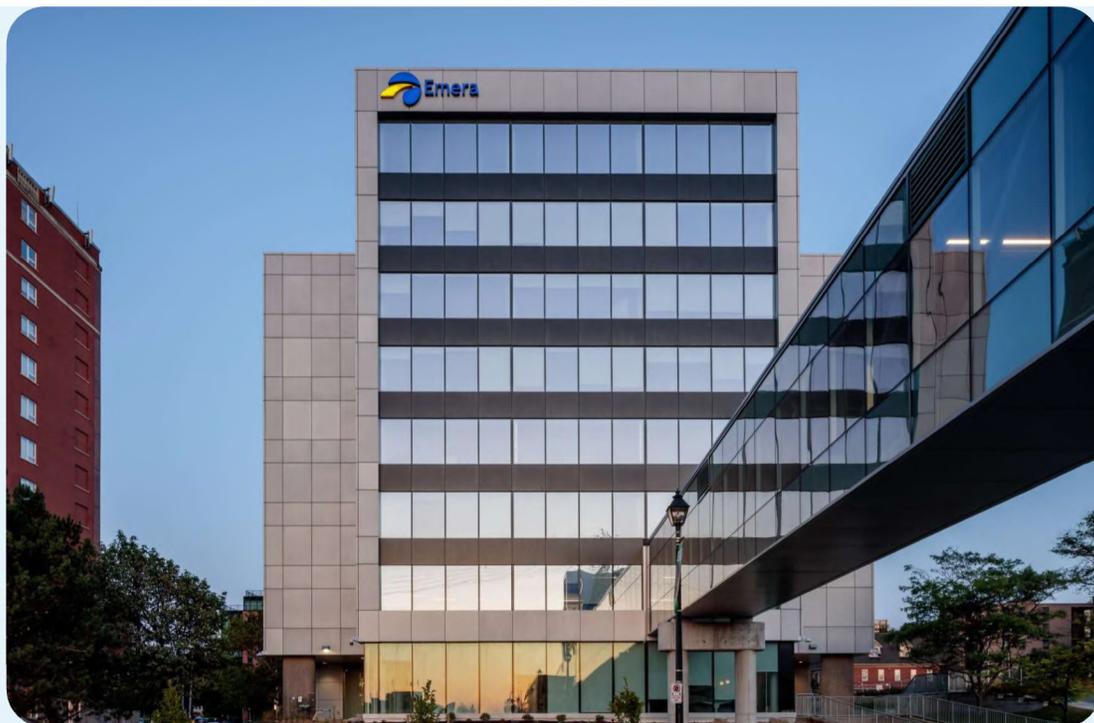
Adjusted net
Income¹ from our
Florida Utilities²

6

High-quality
regulated utilities³

\$43B

total assets⁴



¹ Based on 2024 adjusted net income, excluding corporate costs of \$360M. Adjusted net income is a non-GAAP measure. Please refer to appendix for reconciliation to reported earnings.

² Florida Utilities includes Tampa Electric, Peoples Gas and Seacoast

³ Includes NMGC. Announced agreement for sale of NMGC in August 2024

⁴ As at December 31, 2024



Who is Emera

Emera is a leading North American provider of energy services headquartered in Halifax, Nova Scotia. Emera delivers safe, clean, and reliable energy to customers through investments in regulated electric and natural gas utilities, and related businesses and assets.

6¹ High-Quality Regulated Utilities	2.6 Million Customers ²	\$43 billion Total Assets ²
\$20 billion 5-year Capital Plan ³	~80% Capital Plan Focused in Florida	7%-8% Rate Base CAGR Growth Through 2029
5-7% Target Avg Annual Adj. EPS ⁴ Growth Through 2027	1%-2% Target Annual Dividend Growth	18 Years of Consecutive Dividend Growth

¹ Includes NMGC. Announced agreement for sale of NMGC in August 2024

² As of December 31, 2024

³ Forecasted capital spend 2025-2029 in millions of CAD – USD capital spend translated at 1.35

⁴ Adjusted EPS is a non-GAAP ratio

Why Invest in Emera



Emera is at the forefront of a **transformative era** in energy with **robust opportunities** to invest on behalf of customers across the portfolio.

Our **proven strategy** and **operational excellence** ensure we can capitalize on this growth.

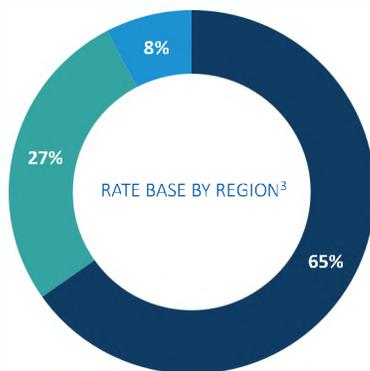
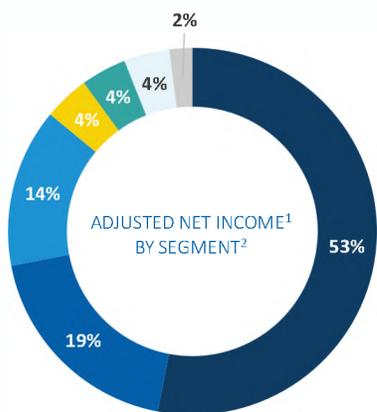
Premium Portfolio
of Regulated
Utilities **Focused
in Florida**

\$20B 5-Year
Capital Plan driving
7%-8% Rate Base
Growth

**Constructive
Regulatory
Environments**

Reliable
Earnings & Dividend
Growth

Premium Portfolio of Regulated Utilities Focused in Florida



70% Adjusted net Income¹ from our Florida Utilities³

- Florida Electric
- Canadian Electric
- Peoples Gas Other Electric
- NMGC
- Pipelines
- Other



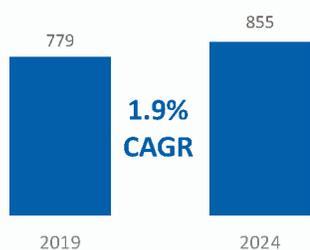
¹ Based on 2024 adjusted net income, excluding corporate costs of \$360M. Adjusted net income is a non-GAAP measure. Please refer to appendix for reconciliation to reported earnings.

² Due to the announced sale of NMGC, Gas Utilities and Infrastructure segment broken into components (PGS, NMGC, Pipelines)

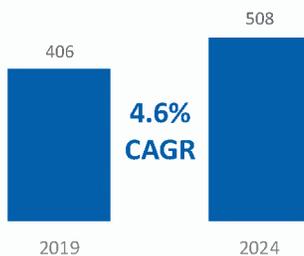
³ Florida includes Tampa Electric, Peoples Gas and Seacoast. Atlantic Canada includes Nova Scotia Power, NSPML and Emera New Brunswick. Other includes New Mexico Gas and the Emera Caribbean

Florida's Population and Economic Growth Drives Investment Demand

TAMPA ELECTRIC CUSTOMERS (000s)

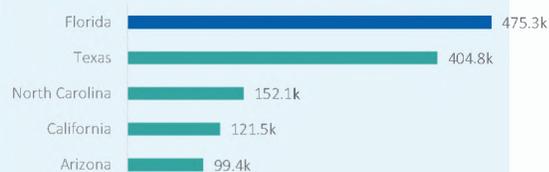


PEOPLES GAS CUSTOMERS (000s)



Hillsborough County population growth expected to outpace that of Florida's over the next 10 years¹

FLORIDA IS #1 STATE FOR TOTAL NET MIGRATION²



FLORIDA'S 5-YEAR REAL GDP GROWTH³ **21.9%**

FLORIDA HAD SECOND HIGHEST POPULATION GROWTH IN 2024²



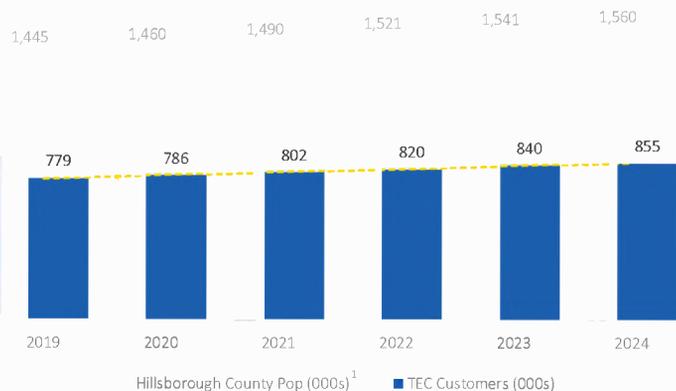
1 Source: Bureau of Economic and Business Research (BEBR), University of Florida

2 Source: [Economists Outlook: National Association of Realtors](#)

3 Source: flgov.com. Growth from Q1 2019 to Q1 2024

Robust Growth In Tampa

Florida's positive economic outlook paired with record population growth in the region is driving strong demand for Electric and Gas services.



26%
 Hillsborough County population growth 2010-2024²

43%
 Tampa region GDP growth 2020-2024³

~2% annual Customer Growth
 at Tampa Electric



1 Bureau of Economic and Business Research (BEBR), University of Florida
 2 Tampa Hillsborough Economic Development Corp.
 3 Florida Chamber of Commerce Tampa Bay Regional Business Leaders Meeting – September 12, 2024

Strong Foundation for Growth at Peoples Gas

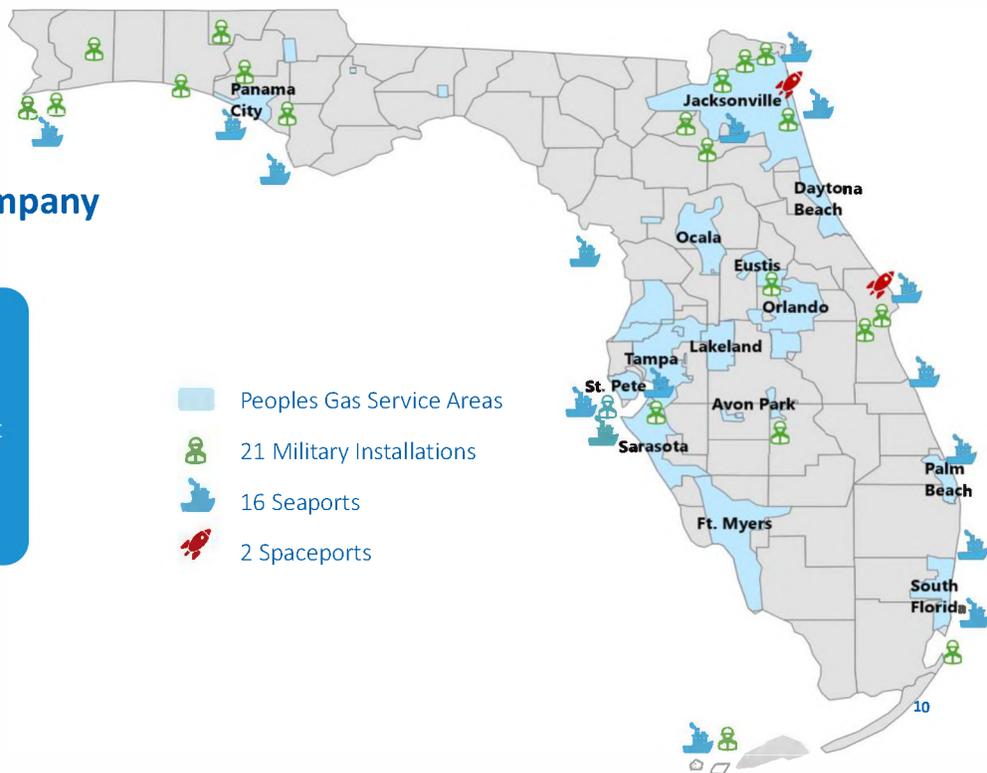
Largest natural gas distribution company
in Florida

~73%

of Florida's electricity
generation comes
from natural gas¹

Top 5

Serving the five largest
metropolitan areas in
Florida



¹US Energy Information Administration

Electrification and Population Growth Driving Demand in Nova Scotia



3.4%

Annual growth rate for Electric Heat Pump installation (21,000 units per year)

30%

of new light-duty vehicle sales in Nova Scotia targeted to be zero-emission by 2030¹

1.1%

forecast population growth through 2030¹

100%

targeted population growth through 2060²



¹ Conference Board of Canada, Nova Scotia Finance and Treasury Board
² Target set by the Nova Scotia Provincial Government

Constructive Regulatory Environments

Emera’s core assets are situated in constructive regulatory environments, where we work collaboratively with regulatory bodies to ensure long-term value creation for both our customers and the utility.

	Tampa Electric	Peoples Gas	Nova Scotia Power
Key Regulatory Features	<ul style="list-style-type: none"> Forward test year Storm reserve Storm protection plan recovery mechanism 	<ul style="list-style-type: none"> Forward test year 	<ul style="list-style-type: none"> Forward test year Storm cost recovery mechanism
ROE & Equity	9.5-11.5%	9.15-11.15%	8.75-9.25%
Equity Thickness	54%	54.7%	40%
Key dates	<ul style="list-style-type: none"> Florida Public Service Commission (“FPSC”) Decision December 2024 New rates effective Jan 1, 2025 	<ul style="list-style-type: none"> FPSC Decision Nov 2023 New rates effective Jan 1, 2024 Filed test year letter in Jan 2025 for new rates expected Jan 1, 2026 	<ul style="list-style-type: none"> Settlement approved Feb 2023 Settlement period Jan 2023 - Dec 2024

Regulatory Update

ONGOING

Peoples Gas¹

General rate application expected March 31, 2025

Anticipate requesting revenue requirements of **\$90M - \$110M USD** in 2026 and **\$25M - \$40M USD** in 2027

Anticipate requesting **11.1%** ROE midpoint

New rates expected January 1, 2026

New Mexico Gas Sale

Transaction announced in August 2024

Regulatory hearing scheduled for June 23, 2025

Expected closing date in Q4 2025

COMPLETED

Tampa Electric

Rate Case

\$281M USD total revenue increase²

Increase in ROE midpoint to **10.5%** from 10.2% and no change to equity thickness

99% of operating expenses and capital expenditures approved

No stay out period required

Storm Cost Recovery

Received approval for recovery of **~\$464M USD** in storm costs

18-month recovery period began March 1, 2025



1 References PGS' 'Test Year Notification' letter filed with the FPSC on January 30, 2025
2 \$185M USD in 2025, \$87M USD in 2026 and \$9M USD in 2027

Financial Highlights

5%-7%

Target adj. EPS¹
CAGR through 2027

7%-8%

Forecasted rate base
growth through 2029

1%-2%

Annual dividend
growth target



¹ Adjusted EPS is a non-GAAP ratio

Clear Financial Objectives Drive Reliable Outcomes

1

Deliver **7%-8%** Rate Base CAGR Through 2029

2

Translate Rate Base Growth Into **5%-7%** Annual Adjusted EPS¹ Growth Through 2027²

3

Deliver Sustainable Annual Dividend Growth Of **1%-2%**

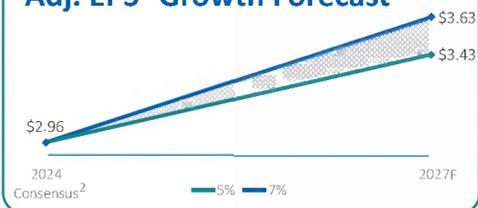
4

Achieve Target Payout Ratio Of **~80%** By The End Of 2027

5

Attain Target Credit Metrics On A **Sustainable** Basis

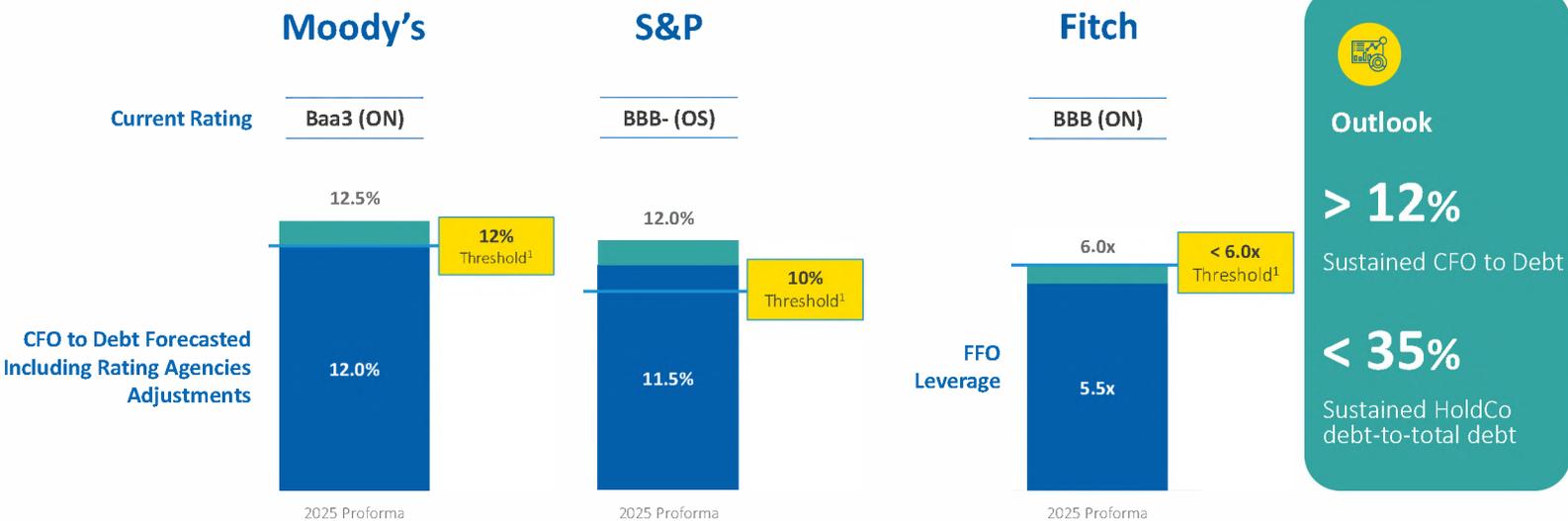
Adj. EPS¹ Growth Forecast



¹ Adjusted EPS is a non-GAAP ratio

² Adjusted EPS Growth was forecasted using \$2.96 as a base for 2024. In line with actual 2024 Adjusted EPS of \$2.94.

Improved Credit Outlook Reflects Balance Sheet Improvements



Note: Proforma adjustment assumes the successful completion of the \$1.3B USD (~\$750M USD net) NMGC disposition in 2025

¹ Credit rating downgrade threshold

■ Represents range based on expected business performance

Note: ON = Outlook Negative | OS = Outlook Stable

Delivering a Growing and Sustainable Dividend



18 years of consecutive dividend increases

5.4% dividend yield¹

1%-2%

Target annual dividend growth



¹ As at December 31, 2024
Note: Denotes annual cash dividends paid

Capital Plan

\$20B

2025-2029
capital spend¹

7%-8%

Rate base CAGR
through 2029

~80%

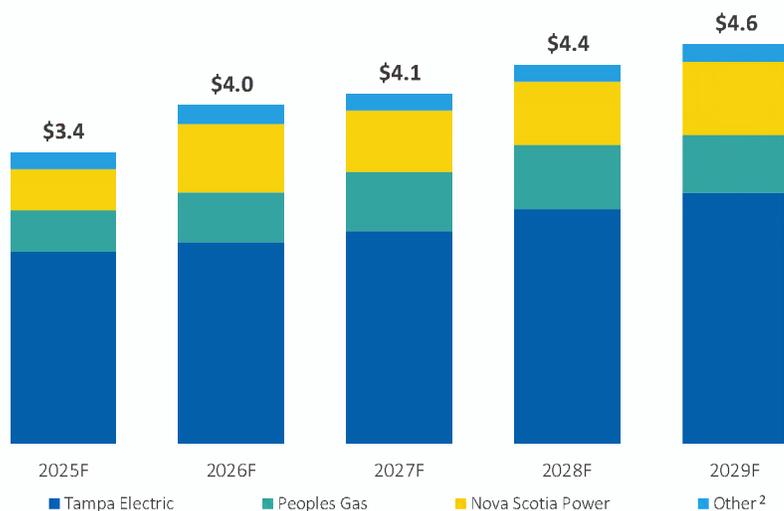
of capital plan
focused in Florida



¹ In millions of CAD / USD capital spend translated at \$1.35

5-Year Capital Plan is the Largest in Emera’s History

2025-2029 Capital Plan (CAD billions¹)



\$20B
 2025-2029 forecasted capital spend¹

~80%
 of capital plan focused in Florida to support 2% and 4% customer growth at TEC and PGS respectively



¹ USD capital spend translated at 1:35

² Includes Corporate, Emera Newfoundland and Emera Caribbean

Note: Every \$0.05 change in the USD/CAD results in a ~ \$625M CAD change in the five-year capital plan and a ~\$450M CAD change in cash from operations over the same five-year period.

Powering the Future, Investing for Our Customers



\$13.2B on Grid Reliability and Modernization

Transmission and distribution projects
at Tampa Electric and Nova Scotia
Power

Generation reliability projects at
Tampa Electric and Nova Scotia Power

Gas infrastructure investment at
Peoples Gas



\$3.6B on Renewable Integration

Solar investment at Tampa Electric

Battery storage at Tampa Electric and
Nova Scotia Power

Renewable Natural Gas at Peoples Gas



\$2.1B on Technological Innovation

Strategic customer-focused growth
opportunities

Information technology projects



Capital Plan Drives Rate Base Growth, Earnings Growth

Forecasted Rate Base (billions)



Emera's capital program

Delivers exceptional value to customers

Drives top-tier rate base growth¹

Supports target annual adjusted EPS² growth of 5%-7% through 2027³



7%-8%

Rate Base CAGR through 2029



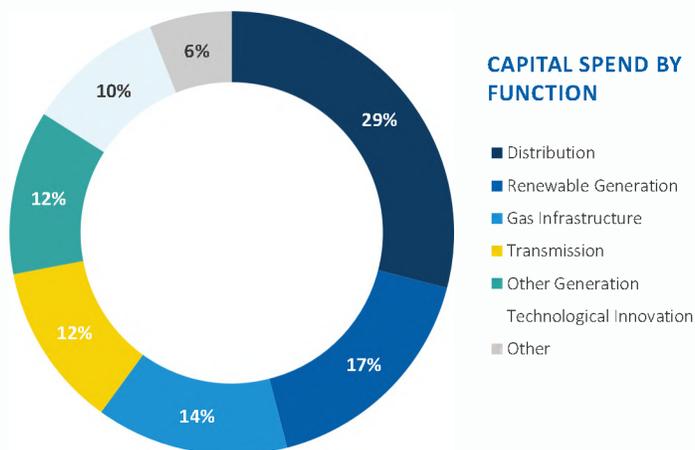
¹ Compared to Canadian Utility Peers

² Adjusted EPS is a non-GAAP ratio

³ Adjusted EPS Growth was forecasted using \$2.96 as a base for 2024 (This reflected Emera's 2024 consensus estimate as of June 28, 2024)

Capital Plan Focused on Delivering Value for Customers

Allocation of \$20B 5-Year Capital Plan



55% of capital spend on transmission, distribution and gas infrastructure in support of reliability and customer growth

17% spend on renewable integration reducing volatile fuel cost exposure

Capital Plan Focused On Customers

Funding Plan Supports Investment Grade Credit Ratings

Reinvested Cash Flows

Growing cash from operations

Net Debt Financing

Debt issued by operating companies to fund growth while maintaining HoldCo debt at ~30-35% of total

Equity

~\$400M per year on average through DRIP and ATM programs¹

Hybrid Capital

\$750M to \$1 billion over the forecast period

Asset Sales

Pending close of \$750M USD NMGC transaction

Target sources of funding for \$20B Capital Plan



2025-2029 Funding Plan



¹ Due to the expected closing of the sale of New Mexico Gas, we do not expect to issue equity from the ATM in 2025

Sustainability

49%

Reduction in
CO₂ emissions
since 2005^{1,2}

80%

Reduction in
generation from
coal since 2005^{1,3}

\$3.6B

Capital spend focused
on renewable
integration



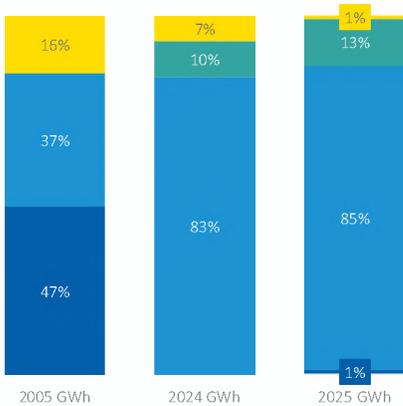
1 As at December 31, 2024

2 CO₂ Scope 1 generation emissions for Tampa Electric and Nova Scotia Power only (approximate)

3 As a percentage of total GWh generated compared to 2005 levels.

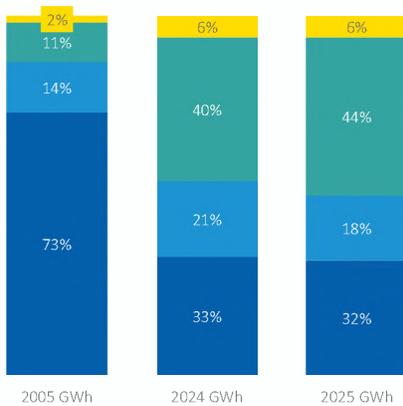
Proven Progress on Decarbonization

Tampa Electric
 % of GWh Generation



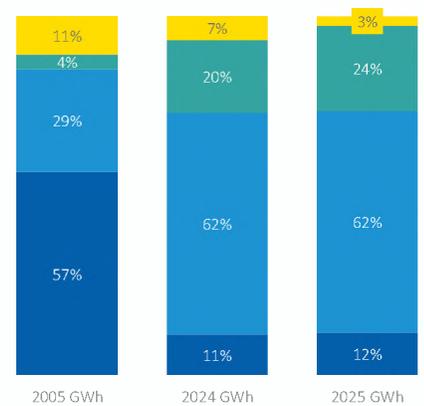
<1%
 of generation from coal by 2025

Nova Scotia Power
 % of GWh Generation



70%
 reduction in coal generation by 2025

Tampa Electric & Nova Scotia Power
 % of GWh Generation



80%
 reduction in coal generation since 2005¹

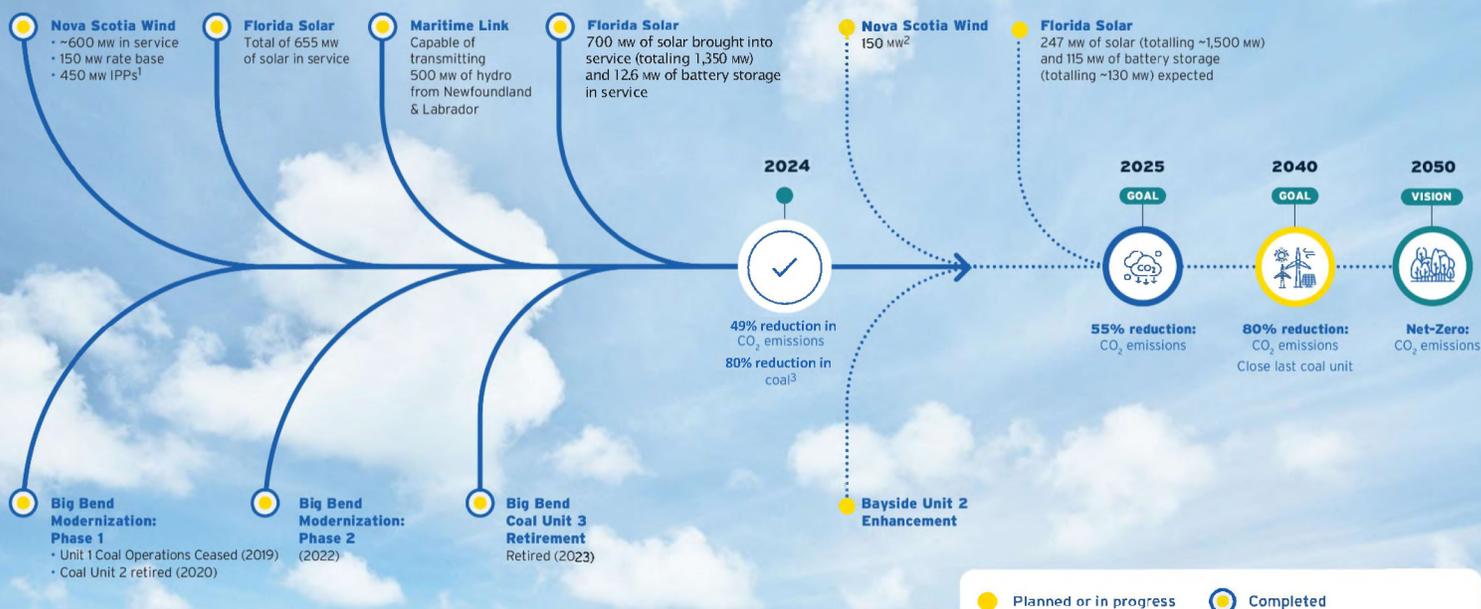
■ Coal/Petcoke ■ Natural Gas/Oil ■ Renewables ■ Imports



Note: 2025 figures represent targets.

¹ As a percentage of total GWh generated compared to 2005 levels. Just 11 per cent of energy generated across Emera comes from coal

Driving Progress Towards Net Zero

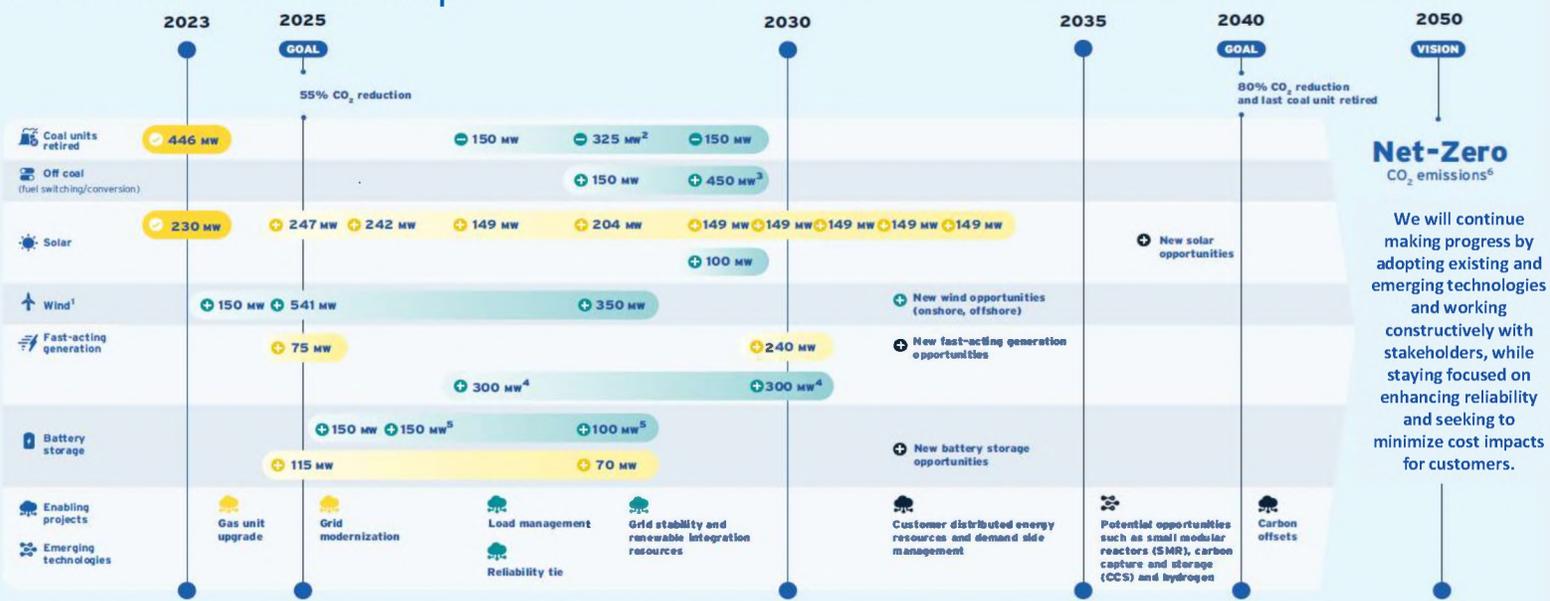


1 Independent Power Producers.
 2 Encompasses provincial procurement programs and other independent power purchase agreements.
 3 As a percentage of total GWh generated compared to 2005 levels. Just 11 per cent of energy generated across Emera comes from coal.

Achieving our climate goals on these timelines is subject to external factors beyond our control, including government policies and regulatory decisions.

Net-Zero Roadmap

Recently completed, in-progress and planned investments outlined in Nova Scotia Power's Path to 2030 Report and Integrated Resource Plan and Tampa Electric's 10-year site plan. 2024 Roadmap will be released in Spring 2025



Net-Zero
 CO₂ emissions⁶

We will continue making progress by adopting existing and emerging technologies and working constructively with stakeholders, while staying focused on enhancing reliability and seeking to minimize cost impacts for customers.

- Nova Scotia Power projects/opportunities
- Tampa Electric projects/opportunities
- Nova Scotia Power/Tampa Electric common projects/opportunities

This roadmap is subject to change and matters beyond our control and is dependent upon decisions of, and/or support from, others including governments, regulators, independent system operators, independent power producers, interconnected utilities, partners, investors, customers and Indigenous communities. We will only proceed with forward-looking investments where we can demonstrate to the satisfaction of regulators that such investments are prudent and the most cost-effective solution for utility customers within the applicable legislative and regulatory regimes



1 Encompasses provincial procurement programs and other independent power purchase agreements.
 2 A total of two units (160 MW and 165 MW).
 3 A total of three 150 MW units.
 4 Utility or independent power producer owned.
 5 Expected independent power purchase agreements.
 6 Emera's Climate Commitment is focused on Nova Scotia Power and Tampa Electric and captures 94 per cent of our Scope 1 and 2 CO₂ emissions.

Social & Governance

Note: 2024 stats will be reported as part of Emera's 2024 sustainability reporting in Spring 2025

Investing in Our Teams & Communities

\$12M

Invested in our communities
in 2023

45%

of senior leaders¹ at Emera Inc.
are women – 36% across Emera



Recognized as one of
**Canada's Best Diversity
Employers** for 2024



For more
information
on Emera's
focus on
sustainability,
please visit
our
[Sustainability
Webpage.](#)

Committed to World Class Safety

3%

decrease in OSHA² injury rate,
over the 5-year average of 1.05

1,925

Senior level management safety
engagements in 2023

0.25 LTI³

24% improvement over the
5-year average of 0.33

Track Record of Strong Governance

50%

of executive officers at Emera Inc.
are women – 39% across Emera

94%

shareholder support in 2023
say on pay

42%

of Emera's Board of Directors are
women, including the Chair⁴



Note: All data as at December 31, 2023, unless otherwise stated

1 Defined as directors and above

2 Occupational Health and Safety Administration

3 Lost time injury frequency

4 As at August 31, 2024

APPENDIX 1:

Emera's Portfolio

\$43B

total assets¹

6

High-quality
regulated utilities²

2.6M

total customers¹



¹ As at December 31, 2024

² Includes NMGC. Announced agreement for sale of NMGC in August 2024



Tampa Electric

Vertically integrated, regulated electric utility serving Hillsborough county and parts of Pasco and Polk counties. To date, 1,350 MW of solar are in service at Tampa Electric, the highest solar generation per customer in the state of Florida. In 2024, solar represented 20% of the generation capacity.

Utility Type

Vertically integrated electric utility

Regulator

Florida Public Service Commission (“FPSC”)

Regulatory Construct – Rates Effective Jan 1, 2025

- 9.5%–11.5% approved ROE
- 54% approved equity
- \$11.1 billion rate base

Recent Regulatory Activity

The FPSC reached a final decision in December 2024 approving new revenues of \$281M (\$185M in 2025, \$87M in 2026 and \$9M in 2027). This reflects a 10.5% ROE midpoint (up from 10.2%) and a 54% equity thickness (unchanged from previous). Tampa Electric’s operating expenses and capital expenditures were substantially approved and there is no stay out requirement.

Capex

2025–2029
 \$9.5 billion

Capacity Mix

- 73% Natural Gas
- 20% Solar
- 7% Coal

Transmission and Distribution

- 2,192 km of transmission
- 20,693 km of distribution

Customers

~855,000



Note: All figures as of December 31, 2024, and in USD, unless otherwise noted



Nova Scotia Power

Regulated integrated electric utility serving the province of Nova Scotia. Nova Scotia Power is delivering one of the most ambitious clean energy transitions in Canada and is an industry leader in GHG reductions in the country.

Utility Type

Vertically integrated electric utility

Regulator

Nova Scotia Utility & Review Board

Regulatory Construct

- 8.75%–9.25% approved ROE
- 40% approved equity
- \$5.7 billion rate base

Regulatory Arrangements

In November 2022, NSP filed a proposed settlement for the GRA, reached between NSP and key customer representatives. The settlement was substantially approved on February 2, 2023, with rates effective the date of the approval.

Capex

2025-2029
 \$3.6 billion

Capacity Mix

- 44% Coal
- 28% Natural Gas and/or Oil
- 21% Renewable
- 7% Petcoke
- PPAs to purchase renewable energy with 533 MW of capacity

Transmission and Distribution

- 5,000 km of transmission
- 28,000 km of distribution

Customers

~557,000



Note: All figures as of December 31, 2024, and in CAD, unless otherwise noted



Emera Newfoundland & Labrador

Emera Newfoundland & Labrador Holdings Inc. (ENL) was established in 2010 as the business entity responsible for the company's strategic investments in Newfoundland and Labrador.

MARITIME LINK

Utility Type

Transmission – ~500 km

Regulator

Nova Scotia Utility & Review Board

Regulatory Construct

- 8.75%–9.25% approved ROE
- 30% approved equity
- \$1.6 billion rate base

Regulatory Arrangements

In November 2024, the UARB approved the recovery of ~\$158M of Maritime Link Costs for 2025, and an additional ~\$42M of financing costs in relation to the \$500M of additional Federally guaranteed debt



Note: All figures as of December 31, 2024, and in CAD, unless otherwise noted



Peoples Gas

Peoples Gas is a leader in customer service and committed to safe and reliable operations. With a legacy dating back to 1895, Peoples Gas has grown to become the largest LDC in Florida, proudly delivering safe, resilient, clean, and affordable natural gas energy solutions.

Utility Type

Natural gas distribution system

Regulator

Florida Public Service Commission

Regulatory Construct

- 9.15%-11.15% approved ROE
- 54.7% approved equity
- \$2.4 billion rate base

Regulatory Arrangements

PGS filed a test year letter with the FPSC in January 2025. PGS anticipates filing a general rate application in March 2025 requesting a revenue requirement of approximately \$90 to \$110 million and subsequent year adjustment for 2027 of approximately \$25 to \$40 million. They also anticipate requesting a 11.1% ROE (Currently 10.15%).

Capex

2025-2029
 \$2.4 billion

Transmission and Distribution

- 25,240 km of main lines
- 14,530 km of service lines

Customers

508,000



Note: All figures as of December 31, 2024, and in USD, unless otherwise noted



New Mexico Gas

Largest gas utility in New Mexico serving 60% of the state's population.

Announced agreement for sale of NMGC on August 5, 2024. The sale is pending regulatory and other approvals and is expected to close in late 2025.

The hearing on the application is expected to begin on June 23, 2025

Utility Type

Natural gas transmission & distribution system

Regulator

New Mexico Public Regulation Commission ("NMPRC")

Regulatory Construct

- 9.375% approved ROE
- 52% approved equity
- \$0.9 billion rate base

Regulatory Arrangements

Reached an unopposed settlement agreement which included \$30M of new base rates, effective October 1, 2024. Rates set on a 9.375% ROE and 52% equity, unchanged from current. Settlement makes weather normalization mechanism a normal tariff. Final regulatory approval was given on July 25, 2024.

Capex

2025
 \$0.1 billion

Transmission and Distribution

- 2,405 km of transmission
- 17,810 km of distribution

Customers

550,000



Note: All figures as of December 31, 2024, and in USD, unless otherwise noted



Emera Caribbean

Emera Caribbean Inc. is the parent company of Barbados Light & Power (“BLPC”) and Grand Bahama Power Company (“GBPC”) and an investor in St. Lucia Electricity Services Ltd. in St. Lucia (“LUCELEC”). Together, these utilities generate and deliver electricity to more than 150,000 residential, commercial and industrial customers.

Utility Companies BLPC GBPC	Utility Type Vertically integrated electric utilities Regulators BLPC: Fair Trade Commission (“FTC”) GBPC: The Grand Bahama Port Authority	Regulatory Construct BLPC: 10.0% approved return on rate base (\$0.5B rate base) GBPC: 8.52% approved return on rate base (\$0.3B rate base)
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Regulatory Arrangements On August 1, 2024, GBPC filed a 3-year rate proposal, to be effective effective on January 1, 2025, based on an 8.5-8.7% allowable regulated return on rate base and a target regulatory ROE of 12.87%. A decision is expected in 2025.	Following dismissal of BLPC’s motion to review from the FTC, the company successfully appealed the dismissal with the High Court of Barbados, through a motion to review. Appeal is scheduled for review in 2025.
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Capex 2025-2029 \$0.6 billion	Capacity Mix <ul style="list-style-type: none"> • 96% Oil-fired • 4% Renewables 	Transmission and Distribution <ul style="list-style-type: none"> • 278 km of transmission • 4,983 km of distribution 	Customers 154,500
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Note: All figures as of December 31, 2024, and in USD, unless otherwise noted

Other Investments

Emera Energy

1 EMERA ENERGY SERVICES

- \$15-30 million USD annual adjusted earnings (\$45-70 million USD of margin).
- Earnings dependent on market conditions.
- Low-risk operations with minimal commodity exposure.

2 BEAR SWAMP

- 50% joint venture.
- 660 MW hydro pumped storage capacity located in western Massachusetts.
- Attracts ISO – NE capacity revenue.

Pipelines

1 EMERA NEW BRUNSWICK

- Regulated by the Canada Energy Regulator.
- 145 km long natural gas pipeline.
- Firm service agreement with Repsol Energy North America Canada Partnership expiring in 2034.

2 MARITIMES & NORTHEAST PIPELINE

- Regulated by the Canada Energy Regulator and the Federal Energy Regulatory Commission (“FERC”).
- 1,400 km long natural gas transmission line.
- 12.9% equity investment.

3 SEACOAST

- Regulated by the FPSC
- Intrastate natural gas transmission company offering services in Florida



Note: All data as of December 31, 2024

APPENDIX 2:

Supporting Financial Information



Capital Project Details

In millions of CAD

RELIABILITY & GRID MODERNIZATION PROJECTS

Electric Grid Modernization at Tampa Electric	\$4,500
Distribution Expansion at PGS	1,780
Generation Expansion and Efficiency at Tampa Electric	1,740
T&D Investments at Nova Scotia Power	1,630
Storm Hardening at Tampa Electric	1,240
Infrastructure Reliability at PGS	1,050
Generation Reliability Investments at Nova Scotia Power	580
New Brunswick Intertie at Nova Scotia Power	330
Storm Hardening at Nova Scotia Power	170
Distribution Expansion at Seacoast	150

SUBTOTAL: RELIABILITY AND MODERNIZATION PROJECTS \$13,170

RENEWABLE ENERGY INTEGRATION

Solar at Tampa Electric	\$2,080
Energy Storage at Tampa Electric	870
Hydro and Wind at Nova Scotia Power	350
Energy Storage at Nova Scotia Power	180
Renewable Natural Gas at Peoples Gas	110

SUBTOTAL: RENEWABLE ENERGY INTEGRATION PROJECTS \$3,590

TECHNOLOGICAL INNOVATION

Strategic Customer-Focused Growth Opportunities	\$1,700
Information Technology Projects	370

SUBTOTAL: TECHNOLOGICAL INNOVATION \$2,070

OTHER \$1,600

TOTAL \$20,430



Capital Forecast

In millions	2025F	2026F	2027F	2028F	2029F	2025–2029 Total
US OPERATIONS						
Tampa Electric	\$1,670	1,750	1,850	2,040	2,180	9,490
Peoples Gas	\$360	430	510	560	500	2,360
Emera Caribbean	\$140	150	100	90	70	550
SUBTOTAL: US OPERATIONS (USD)	\$2,170	2,330	2,460	2,690	2,750	12,400
FX rate assumption	\$1.35	1.35	1.35	1.35	1.35	
SUBTOTAL: US OPERATIONS (CAD)	\$2,930	3,150	3,320	3,630	3,710	16,740
CAD OPERATIONS						
Nova Scotia Power	\$480	800	720	740	860	3,600
Emera Newfoundland	\$5	35	5	5	10	60
Corporate & Other	\$5	5	5	5	10	30
SUBTOTAL: CAD OPERATIONS (CAD)	\$490	840	730	750	880	3,690
TOTAL						
TOTAL CAPITAL FORECAST (CAD)	\$3,420	3,990	4,050	4,380	4,590	20,430



Note: Every \$0.05 change in the CAD/USD results in a ~\$625M CAD change in the five-year capital plan and a ~\$450M CAD change in cash from operations

Average Rate Base Forecast

In millions	2023A	2024A	2024A Adjusted FX ⁵	2025F	2026F	2027F	2028F	2029F	2023–2029 CAGR
US OPERATIONS									
Tampa Electric ^{1,2}	\$10,200	\$11,120	\$11,120	\$12,030	\$13,070	\$14,130	\$15,260	\$16,490	8.3%
Peoples Gas ¹	\$2,190	\$2,380	\$2,380	\$2,720	\$2,930	\$3,180	\$3,460	\$3,950	10.3%
Seacoast ^{3,4}	\$180	\$180	\$180	\$180	\$190	\$220	\$270	\$290	8.3%
Emera Caribbean	\$710	\$720	\$720	\$1,010	\$1,100	\$1,090	\$1,050	\$1,050	6.7%
SUBTOTAL: US OPERATIONS (USD)	\$13,280	\$14,400	\$14,400	\$15,940	\$17,290	\$18,620	\$20,040	\$21,780	8.6%
FX rate assumption	\$1.35	\$1.37	\$1.44	\$1.35	\$1.35	\$1.35	\$1.35	\$1.35	
SUBTOTAL: US OPERATIONS (CAD)	\$17,930	\$19,730	\$20,740	\$21,520	\$23,340	\$25,140	\$27,050	\$29,400	8.6%
CAD OPERATIONS									
Nova Scotia Power	\$5,350	\$5,650	\$5,650	\$5,670	\$6,110	\$6,540	\$6,840	\$7,200	5.1%
Maritime Link	\$1,660	\$1,600	\$1,600	\$1,550	\$1,500	\$1,460	\$1,400	\$1,350	-3.4%
Emera New Brunswick ³	\$430	\$430	\$430	\$410	\$390	\$370	\$350	\$320	-4.8%
SUBTOTAL: CAD OPERATIONS (CAD)	\$7,440	\$7,680	\$7,680	\$7,630	\$8,000	\$8,370	\$8,590	\$8,870	3.0%
TOTAL									
TOTAL AVERAGE RATE BASE	\$25,370	\$27,410	\$28,420	\$29,150	\$31,340	\$33,510	\$35,640	\$38,270	7.1%

1 Capital structures that support the rate base include deferred tax liabilities (DTL), a zero cost-of-capital component of the capital structure in Florida; 2023 capital structures included DTLs of approx. US\$1,300 million at Tampa Electric and approx. US\$280 million at Peoples Gas

2 Excludes fuel and storm cost deferrals included in rate base;

3 Reflects the capital asset values of the regulated pipeline investments;

4 Includes net investment in capital leases;

5 USD/CAD exchange rate for 2024 updated to reflect forecasted rate



New Mexico Gas Forecasts

In millions of USD	2024A	2025F
Capital Forecast	\$130	\$85
Rate Base Forecast	\$835	\$970

Announced agreement for sale of NMGC on August 5, 2024. The sale is pending regulatory and other approvals and is expected to close in late 2025.

The hearing on the application is expected to begin on June 23, 2025



Due to the pending sale, capital and rate base forecasts for New Mexico Gas have been excluded from Emera's 2025-2029 Capital Plan.

Foreign Exchange and Interest Rate Exposure

Foreign Exchange Exposure

In 2025 on a hedge adjusted basis each change \$0.01 change in FX is approximate \$0.01 on adjusted EPS

As of January 31, 2025	Approximate % of USD Earnings Hedged	Rate
2025	62%	\$1.36
2026	27%	\$1.38
2027	13%	\$1.38

Debt Detail

As of December 31, 2024	Notional amount (in millions of CAD)	Percentage of total debt
TOTAL DEBT (SHORT TERM + LONG TERM)		
Variable Rate @ HoldCos	\$1,257	6%
Variable Rate @ OpCos	\$1,690	8%
Fixed Rate @ HoldCos	\$6,471	31%
Fixed Rate @ OpCos	\$11,247	55%



Emera Energy Quarterly Adjusted Earnings Contribution

Millions \$CAD		Q1/23	Q2/23	Q3/23	Q4/23	Q1/24	Q2/24	Q3/24	Q4/24
Marketing & Trading	\$	55	(24)	(4)	19	45	(24)	(7)	16
Maritimes Canada		(2)	3	–	(1)	–	(1)	-	(3)
Bear Swamp		3	1	7	7	1	2	2	1
TOTAL ADJUSTED NET INCOME¹	\$	56	(20)	3	25	46	(23)	(5)	14

Millions \$CAD		2017	2018	2019	2020	2021	2022	2023	2024
MARKETING & TRADING									
Marketing & Trading Adjusted Net Income ¹	\$	15	53	5	8	46	65	46	30
Average (2017–2024)	\$	34							



¹ Adjusted net income is a non-GAAP financial measure

Non-GAAP Reconciliation (Earnings)

For the	Year ended December 31	
	2024	2023
Florida Electric	\$ 644	627
Canadian Electric	232	247
Gas Utilities & Infrastructure	267	214
Other Electric Utilities	48	35
Other, excluding corporate costs	18	42
Adjusted net income before corporate costs	\$ 1,209	1,165
Corporate Costs	(360)	(356)
Adjusted net income attributable to common shareholders	\$ 849	809
Gain on sale of LIL, after-tax (1)	129	-
Financing structure wind-up	58	-
Charges related to wind-down costs and certain asset impairments, after-tax (2)	(26)	-
Charges related to the pending sale of NMGC, after-tax (3)(4)	(225)	-
MTM (loss) gain, after-tax (5)	(291)	169
Net income attributable to common shareholders	\$ 494	978

¹ Net of income tax expense of \$53 million for the year ended December 31, 2024 (2023 – nil)

² Net of income tax recovery of \$6 million for the year ended December 31, 2024 (2023 – nil)

³ Represents (i) \$205 million in non-cash goodwill and other impairment charges, after-tax and (ii) \$19 million in transaction costs, after-tax for the year ended December 31, 2024 (2023 – nil)

⁴ Net of income tax recovery of \$21 million for the year ended December 31, 2024 (2023 – nil)

⁵ Net of income tax recovery of \$117 million recovery for the year ended December 31, 2024 (2023 – \$68 million expense)



Non-GAAP Reconciliation (Adjusted EPS)

For the	Year ended December 31	
	2024	2023
Weighted average shares of common stock outstanding	289.1	273.6
Adjusted EPS – basic	\$ 2.94	2.96
Gain on sale of LIL, after-tax	0.45	-
Financing structure wind-up	0.20	-
Charges related to wind-down costs and certain asset impairments, after-tax	(0.09)	-
Charges related to the pending sale of NMGC, after-tax	(0.78)	-
MTM (loss) gain, after-tax	(1.01)	0.61
Reported EPS – basic	\$ 1.71	3.57

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250029-GU
OPC'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 100
BATES PAGE(S): 17688 - 17689
May 5, 2025**

- 100. Budgets.** Refer to the Direct Testimony of Andrew Nichols at 10 wherein he describes the development of the “2026 projected test year financial data using the company’s normal annual budget process.”
- a. Do you agree that the Company has not yet developed its 2026 budget in the normal course of business, but rather has developed its projected test year financial data using a similar process? If you do not agree, then provide a corrected statement and all support relied on for your response.
 - b. Provide the Company’s annual timeline for developing the budget for the next year in the normal course of business. Identify all documentation of the timeline that actually was used in 2024 for the 2025 budget and the timeline the Company plans to follow this year for the 2026 budget.
 - c. Indicate whether the Company uses a multi-year budget process, e.g., if in 2024, the Company developed budgeted financial data only for 2025 or for 2025 and 2026 or for some other future periods.

ANSWER:

- a. Yes. The company agrees that it developed its 2026 budget (i.e. its projected test year financial data) using a process similar to the company’s normal annual budget process. It is important to note that this normal process, which includes steps such as forecasting capital expenditures needed to serve customers, forecasting expenses to operate and maintain assets and forecasting the funding for asset additions, can be performed to forecast one year or more than one year. This process can also be performed with varying timing and frequency.
- b. It is normal for the company to develop its budget for a specific year in the second half of the prior year. It is also normal for the company to develop two years of projected financial data for a rate case filing in the second half of the year preceding the filing of its petition. The practice of developing two years of forecasted financial data is normal in petitions made to the Commission. In fact, the Commission’s Minimum Filing Requirements reflect this in the required data: Historic Base Year, Historic Base Year + 1 (also referred to as Projected Prior Year), and Projected Test Year.

Regarding the documentation of the timeline used in 2024 for the 2025 and 2026 budget, Peoples is answering this interrogatory in part by producing

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250029-GU
OPC'S SECOND SET OF
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BATES PAGE(S): 17688 - 17689
May 5, 2025**

records as allowed under Florida Rule of Civil Procedure 1.340(c). The file has been produced in response to OPC's Second Set of Production of Documents No. 42 and will be posted on the Consumer Party SharePoint Site or provided via USB in the folder entitled "POD_2_42".

- c. The company uses a budget process, which includes steps such as forecasting capital expenditures needed to serve customers, forecasting expenses to operate and maintain assets and forecasting the funding for asset additions, that can be performed to forecast one year or more than one year. In 2024, the company developed budgeted financial data for 2025 and 2026, completing the process in early 2025 prior to the submission of its petition. It is normal for the company to develop two years of projected financial data for a rate case filing in the second half of the year preceding the filing of its petition. The company's 2024 forecasted test year in its 2023 rate case was developed in this manner and was approved for ratemaking purposes in that case.

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250029-GU
OPC'S FOURTH SET OF
INTERROGATORIES
INTERROGATORY NO. 133
BATES PAGE(S): 17957 - 17958
JUNE 9, 2025**

- 133.** O&M Expense. Refer to the response to OPC's First Set of Interrogatories, Interrogatory No. 63 that was provided as file attachment "(BS 17429) O&M Expense by FERC 2022-2026" in response to OPC's First Set of Interrogatories, Interrogatory No. No. 58. Provide the Company's per books actual O&M expenses by FERC O&M/A&G account/subaccount for 2020 and 2021 in the same format as provided in the cited file attachment, in electronic format with all formulas intact.

ANSWER:

Peoples is answering this interrogatory in part by producing records as allowed under Florida Rule of Civil Procedure 1.340(c); the records reflecting the actual O&M expenses of the Company, categorized by FERC O&M/A&G Account/Subaccount for 2020 and 2021, are included in the same format as provided in the cited file attachment, in electronic format with all formulas intact in the folder entitled "ROG_4_133" or provided via USB.

Peoples Gas System
O&M Expense by FERC
OPC 4th Int No 133

Sending Co.	FERC Account and Description	2020	2021	2022	2023	Historic Base Yr 2024	Historic Base Yr+1 2025	Projected Test Year 2026
PGS	870 Operation Supervision and Engineering	1,447,923	1,616,603	1,683,296	1,716,340	1,944,827	2,128,693	2,842,329
PGS	871 Distribution Load Dispatching	394,550	458,018	508,470	495,100	557,922	580,509	603,962
PGS	872 Compressor Station Labor and Expenses	1,413	199,221	478,898	326,703	443,720	466,910	490,273
PGS	873 Compressor Station Fuel and Power	1,363	25,314	49,049	63,868	52,897	56,283	59,628
PGS	874 Mains and Services Expenses	10,262,242	10,646,581	11,870,726	11,609,645	12,396,029	13,271,435	14,615,451
PGS	875 Measuring and Regulating Station Expenses--General	47,040	25,973	28,879	162,435	312,195	329,426	346,688
PGS	876 Measuring and Regulating Station Expenses--Industrial	2,670	38,470	28,531	29,621	15,071	15,480	15,878
PGS	877 Measuring and Regulating Station Expenses--City Gate Check	300,513	124,083	154,679	254,131	214,552	226,535	238,525
PGS	878 Meter and House Regulator Expenses	5,180,922	5,430,989	6,209,145	5,958,047	6,074,258	5,737,368	6,023,304
PGS	879 Customer Installations Expenses	2,405,430	2,976,699	3,135,605	3,267,359	3,609,485	3,769,431	3,933,614
PGS	880 Other Expenses	3,926,955	3,979,955	5,356,215	5,108,906	5,462,512	6,321,370	7,572,109
PGS	881 Rents	234,571	237,940	232,667	255,770	348,186	356,893	365,211
PGS	885 Maintenance Supervision and Engineering	51,662	37,686	40,760	3,073	18,821	19,640	20,484
PGS	886 Maintenance of Structures and Improvements	158,454	191,289	247,156	227,471	180,384	191,731	202,959
PGS	887 Maintenance of Mains	3,150,906	4,713,516	4,957,600	5,362,115	4,991,427	5,188,760	7,107,891
PGS	888 Maintenance of Compressor Station Equipment	13,834	11,838	4,648	30,119	12,487	13,208	13,926
PGS	889 Maintenance of Meas. and Reg. Sta. Equip.--General	635,529	851,506	856,863	857,979	944,247	989,238	1,035,027
PGS	890 Maintenance of Meas. and Reg. Sta. Equip.--Industrial	652,161	767,344	824,095	1,193,137	1,080,616	1,116,395	1,152,555
PGS	891 Maintenance of Meas. and Reg. Sta. Equip.--City Gate Check	1,627,816	1,694,841	1,978,239	1,610,728	2,153,921	2,264,461	2,376,039
PGS	892 Maintenance of Services	1,465,022	1,271,719	1,473,218	1,483,776	1,573,376	1,628,300	1,701,580
PGS	893 Maintenance of Meters and House Regulators	765,709	791,234	1,032,712	553,839	754,796	794,044	833,605
PGS	894 Maintenance of Other Equipment	49,231	74,488	95,721	62,958	133,063	141,298	149,457
PGS	902 Meter Reading Expenses	1,194,507	1,232,525	1,384,353	1,259,220	1,564,207	1,087,726	1,305,048
PGS	903 Customer Records and Collection Expenses	11,729,206	12,689,703	13,191,923	14,391,939	15,092,224	17,891,706	18,657,720
PGS	904 Uncollectible Accounts	1,866,446	1,572,723	990,792	1,356,186	1,630,819	1,611,232	1,815,103
PGS	912 Demonstrating and Selling Expenses	8,085,151	7,835,743	7,907,602	8,355,640	8,750,601	9,040,308	9,262,644
PGS	913 Advertising Expenses	634,617	853,710	1,049,215	807,190	807,046	827,223	846,499
PGS	916 Miscellaneous Sales Expenses	49,000	51,175	43,550	111,375	36,900	-	-
PGS	920 Administrative and General Salaries	12,688,420	13,964,189	17,067,522	20,777,193	23,581,382	25,193,677	28,406,043
PGS	921 Office Supplies and Expenses	2,941,492	3,286,497	3,660,723	4,361,038	4,892,785	5,208,858	5,670,869
PGS	(Less) (922) Administrative Expenses Transferred--Credit	(8,000,000)	(9,000,000)	(11,126,529)	(11,000,000)	(18,349,150)	(20,900,000)	(23,700,000)
PGS to TPI	(Less) (922) Administrative Expenses Transferred--Credit to TPI	(273,000)	(260,002)	(263,836)	(229,995)	(534,000)	(545,350)	(644,125)
PGS to SGT	(Less) (922) Administrative Expenses Transferred--Credit to SGT	(316,000)	(885,000)	(1,391,823)	(1,757,519)	(2,407,000)	(2,721,875)	(3,062,916)
PGS	923 Outside Services Employed	2,327,279	2,684,482	4,898,718	3,579,198	3,307,127	3,990,118	4,661,909
PGS	924 Property Insurance	86,366	429,161	452,023	213,308	472,426	474,737	476,944
PGS	925 Injuries and Damages	6,090,047	9,172,128	8,888,973	10,754,559	14,739,821	13,204,517	14,771,334
PGS	926 Employee Pensions and Benefits	11,282,457	11,413,183	10,183,270	9,240,901	12,963,911	14,525,287	16,614,633
PGS	928 Regulatory Commission Expenses	(41)	423,476	423,476	423,476	922,016	925,194	1,797,193
PGS	930.1 General Advertising Expenses	232	678	8,842	3,663	25,342	25,976	26,581
PGS	930.2 Miscellaneous General Expenses	23,840,316	21,542,148	23,704,250	24,505,373	25,987,845	28,616,643	31,298,837
PGS	931 Rents	546,276	491,817	505,779	514,386	530,160	543,414	556,075
PGS	932 Maintenance of General Plant	252,680	289,522	442,091	477,402	479,874	492,194	504,036
PGS	407 Tax Reform	-	-	(1,104,663)	(1,166,807)	388,936	388,936	388,936
PGS	413 Gas Plant Leased to Others	827,847	803,068	379,967	36,605	119,708	80,000	80,000
PGS	Total O&M Expense (as adjusted on MFR G-2, p 18b)	108,629,216	114,756,231	122,543,389	127,647,451	138,277,772	145,567,929	161,433,858
PGS	907 Supervision	-	-	-	-	-	-	-
PGS	908 Customer Assistance Expenses (Conservation Clause)	15,937,660	15,963,600	21,618,636	29,383,024	32,487,898	-	-
PGS	909 Informational and Instructional Expenses (Conservation Clause)	1,095,525	1,034,272	1,206,015	1,109,462	1,236,529	-	-
PGS	407.3 Regulatory Debits (less tax reform)	7,616,536	8,277,379	7,673,251	1,923,976	18,772,512	-	-
PGS	407 Cast Iron Bare Steel Expense	-	-	-	-	-	824,178	1,116,260
PGS	TOTAL O&M EXPENSE PER BOOKS C-1 Line 3/G-2 Line 5	133,278,936	140,031,483	153,041,291	160,063,913	190,774,711	146,392,107	162,550,118

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250029-GU
OPC'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 6
BATES PAGE(S): 17100 - 17104
APRIL 30, 2025**

6. Growth. Provide the historic and projected amounts of the following for each of the calendar years from 2021 through the end of the subsequent year and provide the percentage increases of each year end amount over that from the prior year:
- a. Miles of mains and services,
 - b. Residential customers,
 - c. Commercial customers,
 - d. Residential sales measured in therms,
 - e. Commercial sales measured in therms,
 - f. Base rate revenues,
 - g. Employee team members; and
 - h. Contract labor full-time equivalents.

ANSWER:

- a - g. Please see tables below.

The revenue requirements included in the proposed 2027 Subsequent Year Adjustment ("SYA") include incremental costs associated with the annualization of depreciation and amortization expense, property tax expense, and return requirements related to capital investments made during the 2026 test year. The proposed 2027 SYA is not based on a full projected test year for 2027. As a result, the company does not have a "subsequent year projection" for the data requested by this interrogatory.

**Peoples Gas System, Inc.
OPCs IRR No. 6(a-g)**

No. 6(a) Miles of Mains and Services:

	2021		2022		2023		2024		2025F		2026F	
	Total YE	% Growth										
Mains (in Miles)	14,548.15	3.2%	14,953.93	2.8%	15,497.30	3.6%	15,766.36	1.7%	16,216.36	2.9%	16,658.36	2.7%
Services (in Miles)	5,773.70	4.5%	6,042.91	4.7%	6,295.65	4.2%	6,490.48	3.1%	6,694.02	3.1%	6,893.96	3.0%
Total	20,321.85	3.6%	20,996.84	3.3%	21,792.95	3.8%	22,256.84	2.1%	22,910.38	2.9%	23,552.32	2.8%

No. 6(b) Residential Customers:

	2021		2022		2023		2024		2025F		2026F	
	Total YE	% Growth										
Residential Customers	406,601	4.8%	428,540	5.4%	449,445	4.9%	467,290	4.0%	486,431	4.1%	504,073	3.6%

No. 6(c) Commercial Customers:

	2021		2022		2023		2024		2025F		2026F	
	Total YE	% Growth										
Commercial Customers	38,667	2.1%	39,378	1.8%	40,250	2.2%	40,941	1.7%	41,663	1.8%	42,370	1.7%

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250029-GU
OPC'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 6
BATES PAGE(S): 17100 - 17104
APRIL 30, 2025**

Peoples Gas System, Inc.
OPCs IRR No. 6(a-g)

No. 6(d) Residential Sales Measured in Therms ('000):

	2021		2022		2023		2024		2025F		2026F	
	Total YE	% Growth										
Residential Therm Sales	100,036	9.8%	98,445	-1.6%	99,624	1.2%	107,863	8.3%	110,478	2.4%	114,476	3.6%

No. 6(e) Commercial Sales Measured in Therms('000):

	2021		2022		2023		2024		2025F		2026F	
	Total YE	% Growth										
Commercial Therm Sales	517,909	8.8%	528,963	2.1%	545,394	3.1%	563,913	3.4%	548,849	-2.7%	562,046	2.4%

No. 6(f) Base rate revenues (\$000):

	2021		2022		2023		2024		2025F		2026F	
	Total YE	% Growth										
Base rate revenues	289,658	33.3%	298,778	3.1%	312,332	4.5%	442,459	41.7%	445,772	0.7%	459,056	3.0%

No. 6(g) Employee Team Members:

	2021		2022		2023		2024		2025F		2026F	
	Total YE	% Growth										
Headcount	624	0.2%	708	13.5%	764	7.9%	812	6.3%	868	6.9%	956	10.1%

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250029-GU
OPC'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 6
BATES PAGE(S): 17100 - 17104
APRIL 30, 2025**

**PEOPLES GAS SYSTEM, INC.
 DOCKET NO. 20250029-GU
 OPC'S SECOND SET OF
 INTERROGATORIES
 INTERROGATORY NO. 109
 BATES PAGE(S): 17700
 May 5, 2025**

109. Off-System Sales. Refer to the Direct Testimony of Andrew Nichols at 67-68 wherein he describes the significant increase in off-system sales net revenue during 2024 that is not expected to reoccur in the test year. Provide the total amount of off-system sales net revenues in total, the offset amount to PGA clause expenses to the benefit of customers, and the amount retained by the Company for each calendar year 2020 through 2024, budgeted for 2025, and projected during the test year.

ANSWER:

The below table presents the total amount of off-system sales net revenues in total, the offset amount to PGA clause expenses to the benefit of customers, and the amount retained by the company for each calendar year 2020 through 2024, budgeted for 2025, and projected during the test year.

**PEOPLES GAS SYSTEM, INC.
 Off-System Sales
 Net Revenue & Margin Sharing**

Year	Total OSS Net Revenue	Offset to PGA Clause	Retained by Company
2020	\$4,160,930	\$3,120,698	\$1,040,233
2021	\$4,082,844	\$3,062,133	\$1,020,711
2022	\$17,840,585	\$13,380,440	\$4,460,146
2023	\$10,770,429	\$8,077,821	\$2,692,607
2024	\$19,353,496	\$14,515,122	\$4,838,374
2025 Budget	\$10,428,550	\$7,821,412	\$2,607,137
2026 Budget	\$10,583,550	\$7,937,663	\$2,645,888

PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250026-GU
STAFF'S SECOND DATA REQUEST
REQUEST NO. 2
BATES PAGE(S): 42
FILED: MAY 15, 2025

2. Please provide the same information as provided in the table in paragraph 25 of the petition for years 2025 (include actuals and projection until December 2025) and projected numbers for 2026.

ANSWER:

The table below presents the same information as provided in the table in paragraph 25 of the petition for budgeted and actuals for 2025 and projected for 2026.

Year	Total OSS Sales	Cost of OSS	Margin to PGA	Margin to Company
2025: Jan – Apr Actuals	\$22,050,565	\$10,508,149	\$8,656,812	\$2,885,604
2025: May – Dec Forecasted	\$21,568,372	\$14,650,000	\$5,188,779	\$1,729,593
2026 Forecasted	\$33,117,300	\$22,533,752	\$7,937,661	\$2,645,887

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250029-GU
OPC'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 60
BATES PAGE(S): 17436 - 17437
APRIL 30, 2025**

- 60.** Property Tax Expense. Please provide, for each of the past five years as well as projected for the test year and subsequent year,
- a. the total assessed property value,
 - b. the date of each assessed property valuation,
 - c. the average property tax rate across all taxing jurisdictions,
 - d. the Company's total property tax cost, separated into expense and capital,
 - e. the total property taxes paid, and
 - f. any refunds of taxes paid.

ANSWER:

- a. – f. Please see the table below.

**Peoples Gas System
Property Tax Information
OPC Interrogatory No 60**

Tax Year	Valuation Date	Taxable Value		TPP Tax Expense	Levy County			Effective			Total			
		Tangible Personal Property "TPP"	Effective TPP Tax Rate		Alliance RNG Non-Utility	Brightmark RNG Reimbursement	TPP Tax	TPP Net Tax Expense	Taxable Value Real Property	Real Property Tax Rate	Real Property Tax Expense	Refunds	Net Property Tax Expense	% Expense
2020	1/1/2020	768,385,967	0.0163	12,519,635			12,519,635	27,983,585	0.0143	400,985		12,920,620	100	-
2021	1/1/2021	830,522,961	0.0161	13,344,534			13,344,534	30,187,834	0.0141	427,552		13,772,086	100	-
2022	1/1/2022	1,051,916,169	0.0156	16,389,079			16,389,079	35,513,483	0.0133	475,747		16,864,826	100	-
2023	1/1/2023	1,186,999,852	0.0156	18,487,152			18,139,446	42,755,620	0.0202	863,379		19,002,825	100	-
2024	1/1/2024	1,375,778,744	0.0155	21,340,899	(154,452)	(193,254)	20,993,193	46,093,559	0.0196	902,612	(717)	21,895,088	100	-
2026F	1/1/2026	1,824,466,213	0.0156	28,433,134	(155,483)	(312,859)	27,964,792	43,992,330	0.0202	1,358,980		29,323,772	100	-
2027F SYA	1/1/2027	2,212,958,941	0.0156	34,505,059	(148,350)	(312,859)	34,043,850	43,992,330	0.0202	1,358,980		35,402,830	100	-

The new Corporate HQ building initial property tax estimate was derived using "per sq ft tax amount" estimate supplied by developer and confirmed by Hillsborough County Property Appraiser. Therefore, the Real Property Tax Expense amount in the table above for 2026F and 2027F SYA reflects the estimate using a "per sq ft tax amount". Real Property other than the new Corporate HQ building are estimating using a taxable value multiplied by an estimated effective real property tax rate.

17437

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250029-GU
OPC'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 60
BATES PAGE(S): 17436 - 17437
APRIL 30, 2025**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Peoples
Gas System, Inc.

DOCKET NO. 20250029-GU

FILED: April 30, 2025

**PEOPLES GAS SYSTEM, INC.’S RESPONSE TO OFFICE OF PUBLIC COUNSEL’S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-41)**

Pursuant to Rule 106.206, Florida Administrative Code, and Florida Rule of Civil Procedure 1.350, Peoples Gas System, Inc. (“Peoples” or the “company”), hereby responds to the Office of Public Counsel’s (“OPC”) First Request for Production of Documents (Nos. 1-41), served March 31, 2025 (“OPC’s First POD”).

General Objections

1. Peoples objects to each Request for Production in OPC’s First POD (“Request”) to the extent that it seeks information that is duplicative, not relevant to the subject matter of this docket, and is not reasonably calculated to lead to the discovery of admissible evidence.

2. Peoples objects to each Request to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such Requests. Peoples will seek clarification from OPC if a request is not clear, but Peoples will produce documents subject to, and without waiving, this objection.

3. Peoples objects to each Request to the extent it requires Peoples to produce information that is already in the public record before the Florida Public Service Commission (“FPSC” or the “Commission”), or the OPC, or any other public agency and/or available to OPC through normal procedures or is readily accessible through legal or any other search engines.

4. Peoples objects to each Request to the extent that it calls for data or information protected by the attorney-client privilege, the work product doctrine, the accountant-client

- 4. Cost Allocation Manuals (CAM).** Please provide a copy of all cost allocation manuals for 2023, 2024, and 2025 that describe the allocation of costs.

Response:

Peoples' non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled "POD_1_4."

- 5. MFR Supporting Documents.** Please provide a copy of all pre-filed testimony and appendices in Microsoft Word filed with PGS's petition on March 31, 2025. Provide a copy of all exhibits attached to pre-filed testimony and all supporting schedules and workpapers in Excel in live format and with all formulas and calculations intact. If any schedules have been previously provided, please identify the date provided.

Response:

Some of the documents responsive to this request contain proprietary confidential business information. Peoples' non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled "POD_1_5." Peoples' confidential electronic documents responsive to this request will be served by posting on the Confidential Section of the SharePoint or via USB in the folder entitled "CONF_POD_1_5."

- 6. MFR Supporting Documents.** Please provide a copy of the Company's March 31, 2025 MFRs in Excel format with all spreadsheet links and formulas intact with source data used. Provide all documents that identify or explain all assumptions and calculations used. If any schedules have been previously provided, please identify the date provided.

Response:

Peoples' non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled "POD_1_6."

- 7. MFR Supporting Documents.** Please provide all workpapers in your possession, custody or control underlying all schedules of your MFRs and pre-filed testimony and exhibits, and all documents in your possession, custody, or control commenting on analyzing, or evaluating any of these documents and schedules. Provide the requested documents in electronic format, with all formulas and calculations intact and source data used. Include all documents that identify or explain assumptions and calculations used in preparing testimony and exhibits. If any schedules have been previously provided, please identify the date provided.

Response:

Some of the documents responsive to this request contain proprietary confidential business information. Peoples' non-confidential electronic documents responsive to this request will

be served by posting on the SharePoint in the folder entitled “POD_1_7.” Also, please see Peoples’ response to OPC’s First Request for Production of Documents Nos. 5 and 6.

Peoples’ confidential electronic documents responsive to this request will be served by posting on the Confidential Section of the SharePoint or via USB in the folder entitled “CONF_POD_1_7.”

- 8. Chart of Accounts.** Please provide the detailed chart of accounts used by PGS

Response:

Peoples’ non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled “POD_1_8.”

- 9. General Ledger.** Please provide a complete copy of PGS’ detailed general ledger for 2024 and 2025 to date.

Response:

Some of the documents responsive to this request contain proprietary confidential business information. Peoples’ non-confidential electronic documents responsive to this request related to 2024 will be served by posting on the SharePoint in the folder entitled “POD_1_9.” Peoples’ confidential electronic documents responsive to this request related to the first quarter of 2025 will be served by posting on the Confidential Section of the SharePoint or via USB in the folder entitled “CONF_POD_1_9.”

Please note that Peoples can provide transaction level details for individual accounts; however, Peoples accounting system does not provide a detailed level general ledger for all accounts combined. Furthermore, the files provided in this response include accumulated balances for each account for the periods requested.

- 10. Trial Balance.** Please provide a copy of PGS’ trial balances for each month in 2023 and 2024, including closing and adjusting entries and in 2025 to date.

Response:

Some of the documents responsive to this request contain proprietary confidential business information. Peoples’ non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled “POD_1_10.” Peoples’ confidential electronic documents related to the first quarter of 2025 responsive to this request will be served by posting on the Confidential Section of the SharePoint or via USB in the folder entitled “CONF_POD_1_10.”

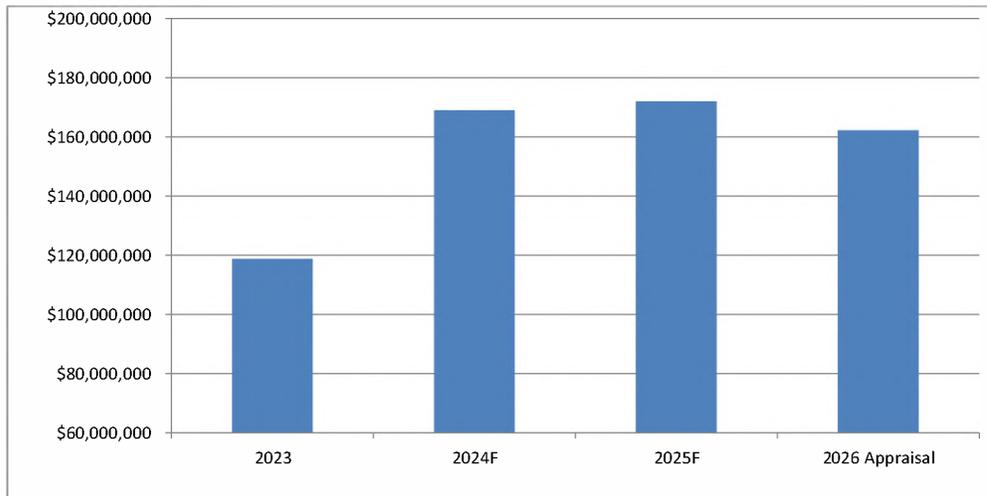
- 11. Incentive/Bonus/At Risk Pay.** Please provide a copy of each of the Company’s incentive compensation/bonus/at-risk plans for 2022, 2023, 2024, and 2025.

Peoples Gas System 2026 Property Tax Budget Appraisal
 Income Approach to Value

Determine 2026 Net Operating Income to Capitalize

	(1)	(2)	(3)	
			(1) x (2)	
<u>Year</u>	<u>NOI</u> <u>As Booked</u>	<u>Weight</u>	<u>Weighted</u> <u>NOI</u>	<u>Use</u>
2023	\$ 118,841,878	1	\$ 19,806,980	
2024F	\$ 169,027,750	2	\$ 56,342,583	
2025F	\$ 172,037,106	3	\$ 86,018,553	
	<u>Mean Average</u>		<u>Weighted Average</u>	
2026 Appraisal NOI	\$ 153,302,245		\$ 162,168,116	\$ 162,200,000

2023 Through 2026 N.O.I. - Dollars In Thousands



2026 Appraisal NOI \$ 162,200,000

Capitalization Rate 8.78%

Income Approach Indicator of Value (All Property) \$ 1,847,480,989

2023	\$ 118,841,878
2024F	\$ 169,027,750
2025F	\$ 172,037,106
2026 Appraisal	\$ 162,200,000

Peoples Gas System
 2026 Property Tax Budget
 Dollars In Thousands

												Total	Excl Alliance	Net of Brightmark payment
												\$	\$	\$
												29,792	29,637	29,324
												2026 Budget		
Allocation	2026 Est	2023 TRIM	2023 TRIM	2023	2023	2026	2026	2026 Est'd	2026	2026	2026	Total 2026	2023 Effective	2023 Effective
Summary	Filed	Assessed TPP	RealAssessed	TPP TAX	Real Prop Tax	Est'd TPP	Est Real Est	TPP Tax	Est. R.E.	Tax	Est Tax	2023 Effective	2023 Effective	
TPP				ACTUAL	Actual	Assessed	Assessed					Mils TPP	Mils Real Property	
								\$	28,433	\$	1,359	\$	29,792	
1 Baker	0.092%	1,697	1,314	0	\$ 17	\$ -	1,697	\$ -	22	\$ -	22	Baker	0.012938	
2 Bay	3.526%	64,976	44,242	1,069	\$ 555	\$ 17	64,976	\$ 1,101	815	\$ 18	833	Bay	0.012545	0.015902713
3 Bradford	0.058%	1,073	822	22	\$ 12	\$ 1	1,073	\$ 23	16	\$ 1	17	Bradford	0.014599	0.045454545
4 Brevard	0.101%	1,863	1,365	0	\$ 23	\$ -	1,863	\$ -	31	\$ -	31	Brevard	0.016850	
5 Broward	6.152%	113,364	81,140	227	\$ 1,547	\$ 6	113,364	\$ 234	2,161	\$ 6	2,168	Broward	0.019066	0.026431718
6 Charlotte	0.990%	11,237	11,668	0	\$ 181	\$ -	11,237	\$ -	283	\$ -	283	Charlotte	0.015513	
7 Clay	1.009%	18,589	12,913	190	\$ 188	\$ 3	18,589	\$ 196	271	\$ 3	274	Clay	0.014559	0.015789474
8 Collier	3.830%	70,563	51,216	0	\$ 487	\$ -	70,563	\$ -	671	\$ -	671	Collier	0.009509	
9 Columbia	0.009%	159	100	0	\$ 1	\$ -	159	\$ -	2	\$ -	2	Columbia	0.010000	
10 Dade	7.537%	138,882	97,196	20,945	\$ 1,830	\$ 465	138,882	\$ 21,573	2,615	\$ 479	3,094	Dade	0.018828	0.022201003
11 Duval	8.714%	160,564	112,150	4,080	\$ 1,934	\$ 76	160,564	\$ 4,202	2,769	\$ 78	2,847	Duval	0.017245	0.018627451
12 Flager	0.379%	6,990	4,728	0	\$ 96	\$ -	6,990	\$ -	142	\$ -	142	Flager	0.020305	
14 Hardee	0.104%	1,911	1,952	0	\$ 27	\$ -	1,911	\$ -	26	\$ -	26	Hardee	0.013832	
15 Hendry	0.045%	823	609	0	\$ 9	\$ -	823	\$ -	12	\$ -	12	Hendry	0.014778	
16 Hernando	1.894%	34,897	5,410	16	\$ 81	\$ -	34,897	\$ 16	522	\$ -	522	Hernando	0.014972	
17 Highlands	0.228%	4,209	1,750	0	\$ 24	\$ -	4,209	\$ -	58	\$ -	58	Highlands	0.013714	
18 Hillsborough	15.974%	265,307	179,239	5,742	\$ 3,106	\$ 102	265,307	\$ 5,914	4,597	\$ 572	5,170	Hillsborough	0.017329	0.017763845
18 Jackson	0.008%	146	121	0	\$ 2	\$ -	146	\$ -	2	\$ -	2	Jackson	0.016529	
19 Lafayette	0.004%	82	35	0	\$ 1	\$ -	82	\$ -	2	\$ -	2	Lafayette	0.028571	
20 Lake	1.635%	30,133	21,136	521	\$ 290	\$ 10	30,133	\$ 537	413	\$ 10	424	Lake	0.013721	0.019193858
21 Lee	3.486%	64,241	48,899	594	\$ 682	\$ 13	64,241	\$ 612	896	\$ 13	909	Lee	0.013947	0.021885522
22 Leon	0.011%	199	127	0	\$ 2	\$ -	199	\$ -	3	\$ -	3	Leon	0.015748	
23 Levy	0.021%	388	2,389	34	\$ 34	\$ 1	388	\$ 35	6	\$ 1	7	Levy	0.014232	0.029411765
Levy Non Utility		10,925					10,925		155		155	Levy		
24 Liberty	0.005%	98	52	0	\$ 1	\$ -	98	\$ -	2	\$ -	2	Liberty	0.019231	
25 Manatee	3.764%	69,356	48,591	32	\$ 657	\$ 1	69,356	\$ 33	938	\$ 1	939	Manatee	0.013521	0.03125
26 Marion	2.848%	52,474	32,833	627	\$ 518	\$ 12	52,474	\$ 646	828	\$ 12	840	Marion	0.015777	0.019138756
27 Martin	0.315%	5,801	4,379	0	\$ 71	\$ -	5,801	\$ -	94	\$ -	94	Martin	0.016214	
28 Nassau	1.429%	26,335	20,671	130	\$ 73	\$ 2	26,335	\$ 134	475	\$ 2	477	Nassau	0.018045	0.015384615
29 Okeechobee	1.232%	22,699					22,699		375		375	Okeechobee		
30 Orange	8.924%	164,433	74,485	2,040	\$ 1,171	\$ 40	164,433	\$ 2,101	2,585	\$ 41	2,626	Orange	0.015721	0.019607843
31 Osceola	1.948%	35,892	26,440	0	\$ 383	\$ -	35,892	\$ -	520	\$ -	520	Osceola	0.014486	
32 Palm Beach	1.624%	29,915	21,429	1,391	\$ 368	\$ 25	29,915	\$ 1,433	514	\$ 26	539	Palm Beach	0.017173	0.017972682
33 Pasco	2.479%	45,673	23,715	87	\$ 389	\$ 2	45,673	\$ 90	749	\$ 2	751	Pasco	0.016403	0.022988506
34 Pinellas	4.221%	77,781	56,311	2,280	\$ 838	\$ 45	77,781	\$ 2,348	1,158	\$ 46	1,204	Pinellas	0.014882	0.019736842
35 Polk	1.624%	29,929	20,765	571	\$ 301	\$ 10	29,929	\$ 588	434	\$ 10	444	Polk	0.014496	0.017513135
36 Putnam	0.170%	3,133	2,243	18	\$ 35	\$ 1	3,133	\$ 19	49	\$ 1	50	Putnam	0.015604	0.055555556
37 Sarasota	3.228%	59,486	43,373	1,234	\$ 552	\$ 19	59,486	\$ 1,271	757	\$ 20	777	Sarasota	0.012727	0.015397083
38 Seminole	1.502%	27,684	19,630	0	\$ 260	\$ -	27,684	\$ -	367	\$ -	367	Seminole	0.013245	
39 St. Johns	4.474%	82,439	54,434	100	\$ 681	\$ 1	82,439	\$ 103	1,031	\$ 1	1,032	St. Johns	0.012511	0.01
40 St. Lucie	0.103%	1,903	1,591	0	\$ 37	\$ -	1,903	\$ -	44	\$ -	44	St. Lucie	0.023256	
41 Sumter	2.540%	46,793	32,273	16	\$ 322	\$ -	46,793	\$ 16	467	\$ -	467	Sumter	0.009977	0
42 Volusia	1.753%	32,307	23,216	745	\$ 398	\$ 14	32,307	\$ 767	554	\$ 14	568	Volusia	0.017143	0.018791946
43 Wakulla	0.006%	117	67	0	\$ 1	\$ -	117	\$ -	2	\$ -	2	Wakulla	0.014925	
	100.00%	1,824,466	\$ 1,187,019	\$ 42,711	\$ 18,485	\$ 866	1,824,466	\$ 43,992	\$ 28,433	\$ 1,359	\$ 29,792		0.015573	0.020276

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250029-GU
OPC'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 30
BATES PAGE(S): 17148
APRIL 30, 2025**

- 30.** SERP. Please fully describe any SERP benefits or benefits associated with non-qualified retirement plans, and quantify the costs associated with such non-qualified plans that are included in the test year and subsequent year projection.

ANSWER:

The TECO Energy Group Supplemental Executive Retirement Plan (SERP) is a non-qualified, non-contributory defined benefit retirement plan available to certain members of senior leadership.

For the 2026 budgeted expenses associated with SERP/non-qualified retirement plans, refer to the 'Supplemental Executive Retirement Plan (SERP)' and 'Restoration Benefit Plan Expense' lines in the table provided in Peoples' response to OPC's First Set of Interrogatories No. 38.

The revenue requirements included in the proposed 2027 Subsequent Year Adjustment ("SYA") include incremental costs associated with the annualization of depreciation and amortization expense, property tax expense and return requirements related to capital investments made during the 2026 test year. The proposed 2027 SYA is not based on a full projected test year for 2027. As a result, the company does not have a "subsequent year projection" for the data requested by this interrogatory.

**PEOPLES GAS SYSTEM, INC.
 DOCKET NO. 20250029-GU
 OPC'S FIRST SET OF
 INTERROGATORIES
 INTERROGATORY NO. 38
 BATES PAGE(S): 17156
 APRIL 30, 2025**

38. Employee Healthcare Benefits Costs. For each employee benefit, please provide the total costs incurred by the Company in each of the past five years and as reflected in the test year and subsequent year revenue requirement.

ANSWER:

Please see the table below.

PGS Benefits 2020-2024 and 2026 Test Year						
	Actual 2020	Actual 2021	Actual 2022	Actual 2023	Actual 2024	Budget 2026
Pensions	\$ 1,911,354	\$ 2,139,749	\$ 1,456,723	\$ 1,124,474	\$ 1,644,116	\$ 3,728,403
Supplemental Executive Retirement Plan (SERP)	140,577	148,722	136,918	162,061	137,884	124,014
Restoration Benefit Plan Expense	220,980	278,908	1,301,471	141,946	113,434	108,137
Benefit Plan Admin Fees	58,009	56,904	60,026	73,754	82,323	101,920
Medical Insurance - Active*	6,415,563	8,873,662	7,145,301	7,947,868	9,942,921	11,770,000
Long-term Care Insurance*	28,687	31,446	34,899	48,850	51,021	56,160
Long-term Disability*	1,346,989	(828,362)	(105,032)	117,425	597,499	650,837
Long-term Disability Premiums*	248,941	262,266	315,791	333,032	290,419	314,117
Employee Wellness*	1,738	5,686	14,977	12,121	49,853	8,320
Post Retirement Benefits FAS 106 - Active	895,012	1,366,243	1,154,998	959,256	986,111	1,041,975
Employer 401K Match	1,878,870	2,303,351	2,337,676	2,594,553	2,931,000	3,675,220
Employer 401K Performance Match	(23,353)	738,574	138,968	(11,793)	338,000	-
Vacations (accrual)	800,654	(152,196)	595,740	460,448	330,984	249,600
Life Insurance	90,361	94,230	103,261	108,455	120,215	140,400
Benefits - Other	328,334	413,326	491,539	702,553	658,020	916,240
Gross Expenses	\$ 14,342,716	\$ 15,732,509	\$ 15,183,256	\$ 14,775,003	\$ 18,273,801	\$ 22,885,343
Long-term incentive compensation	1,919,817	1,135,362	1,496,421	1,426,496	2,351,491	3,529,017
Total Gross Benefits	16,262,534	16,867,871	16,679,677	16,201,499	20,625,292	26,414,360

* Healthcare related benefits

The revenue requirements included in the proposed 2027 Subsequent Year Adjustment (“SYA”) include incremental costs associated with the annualization of depreciation and amortization expense, property tax expense and return requirements related to capital investments made during the 2026 test year. The proposed 2027 SYA is not based on a full projected test year for 2027. As a result, the company does not have a “subsequent year projection” for the data requested by this interrogatory.

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250029-GU
OPC'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 26
BATES PAGE(S): 17142 - 17143
APRIL 30, 2025
REVISED: JUNE 9, 2025**

- 26.** Incentive Compensation Programs. Please identify all compensation, bonuses, and benefits provided to members of the Board of Directors in each of the last three years and as included in the Company's proposed test year and subsequent year revenue requirement.

ANSWER:

The total Peoples' Board of Directors compensation expense recognized in each of the last three years and budgeted for the company's proposed test year revenue requirement is shown below.

<u>Year</u>	<u>Expense</u>
2022	\$129,850
2023	\$122,666
2024	\$111,784
2026	\$137,253

Peoples also incurs board expense allocations passed down from the parent company Emera. Emera executives hold director and/officer positions on internal boards and/or advisory boards. Consistent with the retainer and per meeting fee external directors receive, Emera will allocate a fee for each director and/or officer on a board based on a set fee calculated using market rates for external directors and expenses. The Board of Directors provides strategic advice regarding the operation of each affiliate. Affiliates ultimately benefit from this leadership. Emera charges for its executives' participation on Peoples Board recognized in each of the last three years and budgeted for the company's proposed test year revenue requirement is shown below.

<u>Year</u>	<u>Expense</u>
2022	\$41,270
2023	\$34,499
2024	\$34,641
2026	\$200,000

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The amount Emera charges for its executives' participation on Peoples' Board included in the 2026 test year (\$200,000) was incorrect. The appropriate 2026 test year amount is \$95,000. Peoples will adjust the test year revenue requirement calculation to correct this error. The increase in board member costs charged by Emera to Peoples from 2024 to 2026 is driven by Peoples being allocated an equal 50 percent of the costs for two Emera executives that participate on both the Tampa Electric Board and Peoples Board versus a much smaller allocation of costs in 2024 and prior years that was based on a Modified Massachusetts Methodology.

The revenue requirements included in the proposed 2027 Subsequent Year Adjustment ("SYA") includes incremental costs associated with the annualization of depreciation and amortization expense, property tax expense and return requirements related to capital investments made during the 2026 test year. The proposed 2027 SYA is not based on a full projected test year for 2027. As a result, the company does not have a "subsequent year projection" for the data requested by this interrogatory.

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250029-GU
OPC'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 115
BATES PAGE(S): 17707 - 17708
May 5, 2025**

- 115. Directors and Officers Insurance Expense.** Indicate whether PGS or its affiliates incurs Directors and Officers (“D&O”) Insurance expense. If you do incur such expense, describe the incurred expenses for each and provide the expense incurred by each of the entities in total and the amount assigned/allocated to PGS in total during the test year and the historic base year on a per books basis. In addition, provide the proforma adjustment(s) to the D&O Insurance expense proposed by the Company for the test year.

ANSWER:

In 2024, Director & Officer Liability (“DOL”) Insurance costs were allocated across the TECO affiliates. The charges were amortized to SAP Natural Account 6700504, which for ratemaking is included in FERC Account 925. The total cost allocated to Peoples in 2024 was \$63,081 and is forecasted to be \$73,000 in 2026. The affiliate allocation can be seen in the table below for the historic base year. The amounts for 2026 have not been developed for Tampa Electric and New Mexico Gas.

Affiliate	2024 Actual	Share	2026 Test Year
Tampa Electric	\$262,371	73.8%	N/A
Peoples Gas	63,081	17.8%	\$73,000
New Mexico Gas	29,870	8.4%	N/A
Total DOL Insurance Expense	\$355,322	100.0%	N/A

In Order No. PSC-09-0411-FOF-GU, it was concluded that DOL insurance is a necessary cost and provided benefits to ratepayers (see excerpt below). In addition, per page 37 – 38 of Order No. PSC-09-0411-FOF-GU, the amount of DOL Insurance costs included in Peoples’ 2009 test year rate case was \$342,000, which is greater than the 2024 and 2026 costs allocated to the company.

Excerpt from Order No. PSC-09-0411-FOF-GU, pages 37-38:

Director and Officer Liability (DOL) Insurance has become a necessary part of conducting business for any company or organization and it would be difficult for companies to attract and retain competent directors and officers without it. Moreover, ratepayers receive benefits from being part of a large public company, including, among other things, access to capital. In addition, DOL Insurance is necessary to protect the ratepayers from

**PEOPLES GAS SYSTEM, INC.
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May 5, 2025**

allegations of corporate misdeeds. We also believe that it would be difficult for PGS to obtain DOL Insurance at the 2003 expense level and maybe even at that the requested 2009 expense level because of the current market conditions. Therefore, DOL insurance shall be included in the projected test year and no adjustment shall be made to reduce or remove DOL Insurance. Furthermore, the DOL Insurance recovered through the TECO allocated expenses to Peoples is also appropriate.

In the company's prior rate case it was not ordered to make an adjustment to remove any portion of Director and Officer Liability Insurance from its O&M per books amount. Therefore, the company has not reflected an adjustment in the historic base year or projected test year.

**PEOPLES GAS SYSTEM, INC.
 DOCKET NO. 20250029-GU
 OPC'S SECOND SET OF
 INTERROGATORIES
 INTERROGATORY NO. 117
 BATES PAGE(S): 17711
 May 5, 2025**

117. Investor Relations Expense. Indicate whether PGS or its affiliates incurs Investor Relations expense. If so, describe the incurred expenses for each and provide the expense incurred by each of the entities in total and the amount assigned/allocated to PGS in total during the test year and the historic base year on a per books basis. In addition, provide the proforma adjustment(s) to the Investor Relations expense proposed by the Company for the test year.

ANSWER:

Peoples incurs Investor Relations expense. The total Investor Relations expense allocated to Peoples from Emera for 2024 historic base year and 2026 projected test year is \$29,556 and \$43,088, respectively. Please see MFR Schedule G-2, page 19g line No. 6 as these amounts are included in the Finance area total amounts.

Please see the table below, which shows the 2024 Investor Relations expense allocated to all the affiliates in Canadian dollars from Emera and the percentage of the allocation. The allocation across affiliates has not been produced for 2026 as Emera only provides a one-year budget for all affiliates.

Shared Service Costs - Summary by Cost Center

			Total Costs to be Allocated	NSP	Emera Holdco	Brunswick Pipeline	Emera Energy (Trading Company)	Barbados Light & Power	Grand Bahamas (GBPC)	Emera Technologies Ltd. (ETL)	TSI	Tampa Electric	People's Gas	New Mexico Gas
Investor Relations (CAD \$)	862,851	287,716	216,955	3,925	6,667	3,802	2,743	44	21	285,025	41,138	14,815		
Investor Relations Allocation %	100.0%	33.3%	25.1%	0.5%	0.8%	0.4%	0.3%	0.0%	0.0%	33.0%	4.8%	1.7%		

The Commission did not make an adjustment to remove any portion of Investor Relations expense from its O&M per books amount in the company's last base rate case. Therefore, the company has not reflected an adjustment in the historic base year or projected test year.

**PEOPLES GAS SYSTEM, INC.
 DOCKET NO. 20250029-GU
 OPC'S SECOND SET OF
 INTERROGATORIES
 INTERROGATORY NO. 116
 BATES PAGE(S): 17709 – 17710
 May 5, 2025**

116. Board of Directors Expense. Indicate whether PGS or its affiliates incurs Board of Directors (“BOD”) expense. If you do incur such expense, describe the incurred expenses for each and provide the expense incurred by each of the entities in total and the amount assigned/allocated to PGS in total during the test year and the historic base year on a per books basis. In addition, provide the proforma adjustment(s) to the BOD expense proposed by the Company for the test year.

ANSWER:

Peoples does incur Board of Directors expense. Please see the total Board of Directors expense for the 2024 historic base year and 2026 projected test year in the table below. Please note that a portion of the expense is related to Peoples’ Board of Directors and a portion is allocated to Peoples from Emera for its Board of Directors. Please see MFR Schedule G-2, page 19g line 5 as the amounts allocated from Emera are included in the Executive area total amounts.

Year	Total BOD Expense	Peoples BOD	Allocated from Emera
2024	\$146,425	\$111,784	\$34,641
2026	\$337,253	\$137,253	\$200,000

Emera executives hold director and/officer positions on internal boards and/or advisory boards. Beginning in 2025, consistent with the retainer and per meeting fee external directors receive, Emera will allocate a fee for each director and/or officer on a board based on a set fee calculated using market rates for external directors and expenses. The Board of Directors provides strategic advice regarding the operation of each affiliate. Affiliates ultimately benefit from this leadership. The increase in board member costs charged by Emera to Peoples from 2024 to 2026 is driven by the substitution of Emera employees for external board members. However, the amount Emera charges for its executives’ participation on Peoples’ Board included in the 2026 test year (\$200,000) was incorrect. The appropriate 2026 test year amount is \$95,000. Peoples will adjust the test year revenue requirement calculation to correct this error.

Please see the table below, which shows the 2024 Board of Directors expense allocated to all the affiliates in Canadian dollars from Emera and the percentage of the allocation. The allocation across affiliates has not been produced for 2026 as Emera only provides a one-year budget for all affiliates.

**PEOPLES GAS SYSTEM, INC.
 DOCKET NO. 20250029-GU
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Shared Service Costs - Summary by Cost Center



	Total Costs to be Allocated	NSP	NSP Maritime Link	Emera US Holding Inc.	Grand HVAC	Brunswick Pipeline	Emera Energy (Trading Company)	Barbados Light & Power	Grand Bahamas (GBPC)	Emera Technologies Ltd. (ETL)	Tampa Electric	People's Gas	New Mexico Gas
Board Allocations (CAD \$)	1,441,605	255,000	47,892	13,492	30,000	60,000	255,000	62,294	34,072	206,138	281,590	47,720	148,408
Board Allocations Allocation %	100.0%	17.7%	3.3%	0.9%	2.1%	4.2%	17.7%	4.3%	2.4%	14.3%	19.5%	3.3%	10.3%

The Commission did not make an adjustment to remove any portion of Board of Directors expense from Peoples' O&M per books amount in the company's last base rate case. Therefore, the company has not reflected an adjustment in the historic base year or projected test year.

**PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250029-GU
OPC'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 112
BATES PAGE(S): 17703 - 17704
May 5, 2025**

- 112. WAM System Amortization.** Refer to the Direct Testimony of Luke Buzzard at 19 wherein he describes the request to increase the amortization period of the WAM system from 15 to 20 years and the related reduction of WAM amortization expense of \$717,633. Provide the amount of the WAM system costs to be amortized and the calculation of the potential \$717,633 in amortization expense savings in electronic format with all formulas intact.

ANSWER:

Peoples is answering this interrogatory in part by producing records as allowed under Florida Rule of Civil Procedure 1.340(c). The 2026 test year 13-month average WAM system cost amount to be amortized is \$45,126,115. Please see the file posted to the Consumers SharePoint site in a folder entitled "ROG_2_112" or provided via USB.

Peoples Gas System, Inc.

Impact of New WAM Sub-account on 2025 & 2026 Depreciation Expense

	<u>Dec-24</u>	<u>Jan-25</u>	<u>Feb-25</u>	<u>Mar-25</u>	<u>Apr-25</u>	<u>May-25</u>	<u>Jun-25</u>	<u>Jul-25</u>	<u>Aug-25</u>	<u>Sep-25</u>	<u>Oct-25</u>	<u>Nov-25</u>	<u>Dec-25</u>
WAM Plant Balance	\$ 40,651,851	\$ 41,183,644	\$ 41,388,026	\$ 41,883,061	\$ 42,125,910	\$ 42,318,243	\$ 42,510,577	\$ 42,702,910	\$ 42,895,244	\$ 43,087,577	\$ 43,279,910	\$ 43,472,244	\$ 43,914,577
WAM Additions (\$000)													
WAM Upgrade	\$ 532	\$ 736	\$ 960	\$ 1,203	\$ 1,395	\$ 1,587	\$ 1,780	\$ 1,972	\$ 2,164	\$ 2,357	\$ 2,549	\$ 2,741	\$ 2,741
WAM Enhancements 2024	\$ -	\$ -	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271
WAM Enhancements 2026	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
WAM Enhancements 2027	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
WAM Enhancements 2028	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
WAM Enhancements 2029	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
WAM Enhancements 2025	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 250
Depr. Exp. Current	6.6%	\$ 223,585	\$ 226,510	\$ 227,634	\$ 230,357	\$ 231,693	\$ 232,750	\$ 233,808	\$ 234,866	\$ 235,924	\$ 236,982	\$ 238,040	\$ 239,097
Depr. Exp. Proposed	5.0%												
Monthly Decrease in Dep Exp.													
Accumulated Dep Decrease	\$ -												

Impact of New WAM Sub-account on 2025 & 2026

Reduction in Depreciation Expense	\$ <u>717,633</u>
Reduction in 13-Month Average Accumulated Depreciation	\$ <u>355,547</u>

Peoples Gas Sy:

Impact of New WAM

	<u>Jan-26</u>	<u>Feb-26</u>	<u>Mar-26</u>	<u>Apr-26</u>	<u>May-26</u>	<u>Jun-26</u>	<u>Jul-26</u>	<u>Aug-26</u>	<u>Sep-26</u>	<u>Oct-26</u>	<u>Nov-26</u>	<u>Dec-26</u>
WAM Plant Balance	\$ 43,914,577	\$ 43,914,577	\$ 44,164,577	\$ 44,414,577	\$ 44,664,577	\$ 44,914,577	\$ 45,164,577	\$ 45,414,577	\$ 45,664,577	\$ 45,914,577	\$ 46,164,577	\$ 48,414,577
WAM Additions (\$000)	\$ 2,741	\$ 2,741	\$ 2,991	\$ 3,241	\$ 3,491	\$ 3,741	\$ 3,991	\$ 4,241	\$ 4,491	\$ 4,741	\$ 4,991	\$ 5,241
	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271	\$ 271
	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,000
	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	\$ 250	\$ 250	\$ 250	\$ 250	\$ 250	\$ 250	\$ 250	\$ 250	\$ 250	\$ 250	\$ 250	\$ 250
Depr. Exp. Current	\$ 241,530	\$ 241,530	\$ 241,530	\$ 242,905	\$ 244,280	\$ 245,655	\$ 247,030	\$ 248,405	\$ 249,780	\$ 251,155	\$ 252,530	\$ 253,905
Depr. Exp. Proposed	\$ 182,977	\$ 182,977	\$ 182,977	\$ 184,019	\$ 185,061	\$ 186,102	\$ 187,144	\$ 188,186	\$ 189,227	\$ 190,269	\$ 191,311	\$ 192,352
Monthly Decrease in D	\$ 58,553	\$ 58,553	\$ 58,553	\$ 58,886	\$ 59,219	\$ 59,553	\$ 59,886	\$ 60,219	\$ 60,553	\$ 60,886	\$ 61,219	\$ 61,553
Accumulated Dep Deci	\$ 58,553	\$ 117,106	\$ 175,658	\$ 234,544	\$ 293,764	\$ 353,317	\$ 413,203	\$ 473,422	\$ 533,975	\$ 594,861	\$ 656,080	\$ 717,633

Impact of New WAM

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Peoples
Gas System, Inc.

DOCKET NO. 20250029-GU

FILED: April 30, 2025

**PEOPLES GAS SYSTEM, INC.’S RESPONSE TO OFFICE OF PUBLIC COUNSEL’S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-41)**

Pursuant to Rule 106.206, Florida Administrative Code, and Florida Rule of Civil Procedure 1.350, Peoples Gas System, Inc. (“Peoples” or the “company”), hereby responds to the Office of Public Counsel’s (“OPC”) First Request for Production of Documents (Nos. 1-41), served March 31, 2025 (“OPC’s First POD”).

General Objections

1. Peoples objects to each Request for Production in OPC’s First POD (“Request”) to the extent that it seeks information that is duplicative, not relevant to the subject matter of this docket, and is not reasonably calculated to lead to the discovery of admissible evidence.

2. Peoples objects to each Request to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such Requests. Peoples will seek clarification from OPC if a request is not clear, but Peoples will produce documents subject to, and without waiving, this objection.

3. Peoples objects to each Request to the extent it requires Peoples to produce information that is already in the public record before the Florida Public Service Commission (“FPSC” or the “Commission”), or the OPC, or any other public agency and/or available to OPC through normal procedures or is readily accessible through legal or any other search engines.

4. Peoples objects to each Request to the extent that it calls for data or information protected by the attorney-client privilege, the work product doctrine, the accountant-client

- 4. Cost Allocation Manuals (CAM).** Please provide a copy of all cost allocation manuals for 2023, 2024, and 2025 that describe the allocation of costs.

Response:

Peoples' non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled "POD_1_4."

- 5. MFR Supporting Documents.** Please provide a copy of all pre-filed testimony and appendices in Microsoft Word filed with PGS's petition on March 31, 2025. Provide a copy of all exhibits attached to pre-filed testimony and all supporting schedules and workpapers in Excel in live format and with all formulas and calculations intact. If any schedules have been previously provided, please identify the date provided.

Response:

Some of the documents responsive to this request contain proprietary confidential business information. Peoples' non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled "POD_1_5." Peoples' confidential electronic documents responsive to this request will be served by posting on the Confidential Section of the SharePoint or via USB in the folder entitled "CONF_POD_1_5."

- 6. MFR Supporting Documents.** Please provide a copy of the Company's March 31, 2025 MFRs in Excel format with all spreadsheet links and formulas intact with source data used. Provide all documents that identify or explain all assumptions and calculations used. If any schedules have been previously provided, please identify the date provided.

Response:

Peoples' non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled "POD_1_6."

- 7. MFR Supporting Documents.** Please provide all workpapers in your possession, custody or control underlying all schedules of your MFRs and pre-filed testimony and exhibits, and all documents in your possession, custody, or control commenting on analyzing, or evaluating any of these documents and schedules. Provide the requested documents in electronic format, with all formulas and calculations intact and source data used. Include all documents that identify or explain assumptions and calculations used in preparing testimony and exhibits. If any schedules have been previously provided, please identify the date provided.

Response:

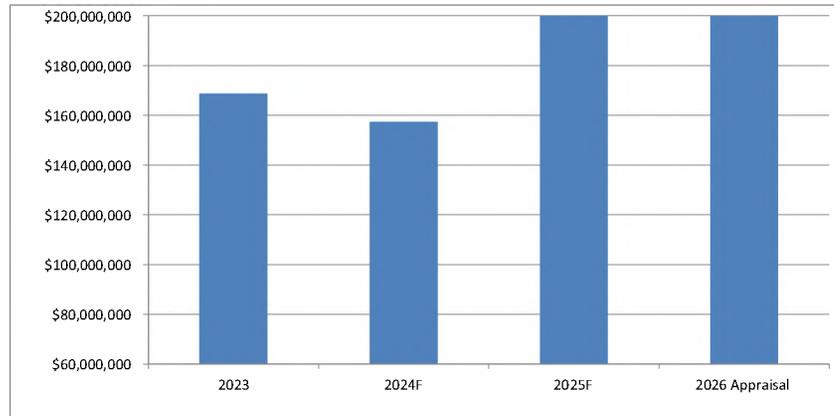
Some of the documents responsive to this request contain proprietary confidential business information. Peoples' non-confidential electronic documents responsive to this request will

Peoples Gas System 2026 Property Tax Budget Appraisal
 Income Approach to Value

Determine 2026 Net Operating Income to Capitalize

	(1)	(2)	(3)	
	NOI	Weight	(1) x (2)	
Year	As Booked		Weighted NOI	
2024	\$ 168,827,176	1	\$ 28,137,863	Per 2024 SR
2025F	\$ 157,385,906	2	\$ 52,461,969	Per 2025 SR
2026F w/Rates	\$ 223,651,232	3	\$ 111,825,616	Per G-5, line 3
	Mean Average		Weighted Average	Use
2026 Appraisal NOI	\$ 183,288,105		\$ 192,425,448	\$ 200,000,000 <i>due to 2026F being so much higher, will be raised up in negotiations with appraisers</i>

2023 Through 2026 N.O.I. - Dollars In Thousands



2026 Appraisal NOI \$ 200,000,000

Capitalization Rate 8.78%

Income Approach Indicator of Value (All Property) \$ 2,278,028,346

2023	\$ 168,827,176
2024F	\$ 157,385,906
2025F	\$ 223,651,232
2026 Appraisal	\$ 200,000,000

Peoples Gas System
 2026 Property Tax Budget
 Dollars In Thousands

												2026 YE SYA Budget	\$	Total	Excl Alliance	Net of Brightmark payment		
												35,864		35,864	\$	35,716	\$	35,403
Allocation	2026 Est	2023 TRIM	2023 TRIM	2023	2023	2026	2026	2026 Est'd	2026	2026 Est'd	2026	Total 2026	2023 Effective	2023 Effective				
Summary	Filed	Assessed	RealAssessed	TPP TAX	Real Prop Tax	Est'd TPP	Est Real Est	TPP Tax	Est. R.E.	Tax	TPP Tax	Est Tax	Mils TPP	Mils Real Property				
TPP				ACTUAL	Actual	Assessed	Assessed											
								\$	34,505	\$	1,359	\$	35,864					
1 Baker	0.092%	2,053	1,314	0	17	2,053	-	27	-	-	27	27 Baker	0.012938					
2 Bay	3.526%	78,631	44,242	1,069	555	78,631	1,101	986	18	18	1,004	27 Baker	0.012545	0.015902713				
3 Bradford	0.058%	1,298	822	22	12	1,298	23	19	1	1	20	31 Clay	0.014599	0.045454545				
4 Brevard	0.101%	2,255	1,365	0	23	2,255	-	38	-	-	38	38 Brevard	0.016850					
5 Broward	6.152%	137,187	81,140	227	1,547	137,187	234	2,616	6	6	2,622	342 Charlotte	0.019066	0.026431718				
6 Charlotte	0.990%	22,070	11,668	0	181	22,070	-	342	-	-	342	331 Clay	0.015513					
7 Clay	1.009%	22,495	12,913	190	188	22,495	196	328	3	3	331	812 Collier	0.014559	0.015789474				
8 Collier	3.830%	85,392	51,216	0	487	85,392	-	812	-	-	812	2 Columbia	0.009509					
9 Columbia	0.009%	192	100	0	1	192	-	2	-	-	2	632 Hernando	0.010000					
10 Dade	7.537%	168,069	97,196	20,945	1,830	168,069	21,573	3,164	479	479	3,643	70 Highlands	0.018828	0.022201003				
11 Duval	8.714%	194,307	112,150	4,080	1,934	194,307	4,202	3,351	78	78	3,429	172 Flager	0.017245	0.018627451				
12 Flager	0.379%	8,459	4,728	0	96	8,459	-	172	-	-	172	32 Hardee	0.020305					
14 Hardee	0.104%	2,313	1,952	0	27	2,313	-	32	-	-	32	15 Hendry	0.013832					
15 Hendry	0.045%	996	609	0	9	996	-	15	-	-	15	3 Lafayette	0.014778					
16 Hernando	1.894%	42,231	5,410	16	81	42,231	16	632	-	-	632	511 Lake	0.014972					
17 Highlands	0.228%	5,094	1,750	0	24	5,094	-	70	-	-	70	627 Hillsborough	0.013714					
18 Hillsborough	15.974%	328,934	179,239	5,742	3,106	328,934	5,914	5,700	572	572	6,272	3 Jackson	0.017329	0.017763845				
18 Jackson	0.008%	176	121	0	2	176	-	3	-	-	3	3 Lafayette	0.016529					
19 Lafayette	0.004%	99	35	0	1	99	-	3	-	-	3	577 Nassau	0.028571					
20 Lake	1.635%	36,466	21,136	521	290	36,466	537	500	10	10	511	453 Okeechobee	0.013721	0.019193858				
21 Lee	3.486%	77,741	48,899	594	682	77,741	612	1,084	13	13	1,098	4 Leon	0.013947	0.021885522				
22 Leon	0.011%	241	127	0	2	241	-	4	-	-	4	8 Levy	0.015748					
23 Levy	0.021%	470	2,389	34	34	470	35	7	1	1	8	148 Levy	0.014232	0.029411765				
Levy Non Utility		10,424				10,424	-	148			148	2 Liberty						
24 Liberty	0.005%	119	52	0	1	119	-	2	-	-	2	1,136 Manatee	0.019231					
25 Manatee	3.764%	83,931	48,591	32	657	83,931	33	1,135	1	1	1,136	1,014 Marion	0.013521	0.03125				
26 Marion	2.848%	63,502	32,833	627	518	63,502	646	1,002	12	12	1,014	114 Martin	0.015777	0.019138756				
27 Martin	0.315%	7,020	4,379	0	71	7,020	-	114	-	-	114	577 Nassau	0.016214					
28 Nassau	1.429%	31,869	20,671	130	373	31,869	134	575	2	2	577	453 Okeechobee	0.018045	0.015384615				
29 Okeechobee	1.232%	27,469				27,469	-	453	-	-	453	3,170 Orange	0.018045					
30 Orange	8.924%	198,990	74,485	2,040	1,171	198,990	2,101	3,128	41	41	3,170	629 Osceola	0.015721	0.019607843				
31 Osceola	1.948%	43,434	26,440	0	383	43,434	-	629	-	-	629	647 Palm Beach	0.014486					
32 Palm Beach	1.624%	36,202	21,429	1,391	368	36,202	1,433	622	26	26	647	909 Pasco	0.017173	0.017972682				
33 Pasco	2.479%	55,272	23,715	87	389	55,272	90	907	2	2	909	535 Polk	0.016403	0.022988506				
34 Pinellas	4.221%	94,128	56,311	2,280	838	94,128	2,348	1,401	46	46	1,447	60 Putnam	0.014882	0.019736842				
35 Polk	1.624%	36,219	20,765	571	301	36,219	588	525	10	10	535	444 Seminole	0.014496	0.017513135				
36 Putnam	0.170%	3,792	2,243	18	35	3,792	19	59	1	1	60	1,249 St. Johns	0.015604	0.055555556				
37 Sarasota	3.228%	71,987	43,373	1,234	552	71,987	1,271	916	20	20	936	444 Seminole	0.012727	0.015397083				
38 Seminole	1.502%	33,501	19,630	0	260	33,501	-	444	-	-	444	565 Sumter	0.013245					
39 St. Johns	4.474%	99,763	54,434	100	681	99,763	103	1,248	1	1	1,249	685 Volusia	0.012511	0.01				
40 St. Lucie	0.103%	2,303	1,591	0	37	2,303	-	54	-	-	54	2 Wakulla	0.023256					
41 Sumter	2.540%	56,627	32,273	16	322	56,627	16	565	-	-	565	0.099977		0				
42 Volusia	1.753%	39,097	23,216	745	398	39,097	767	670	14	14	685	0.017143		0.018791946				
43 Wakulla	0.006%	142	67	0	1	142	-	2	-	-	2	0.014925						
	100.00%	2,212,959	\$ 1,187,019	\$ 42,711	\$ 18,485	\$ 2,212,959	\$ 43,992	\$ 34,505	\$ 1,359	\$	35,864	0.015573		0.020276				

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Peoples
Gas System, Inc.

DOCKET NO. 20250029-GU

FILED: May 5, 2025

**PEOPLES GAS SYSTEM, INC.'S RESPONSE TO OFFICE OF PUBLIC COUNSEL'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 42-46)**

Pursuant to Rule 106.206, Florida Administrative Code, and Florida Rule of Civil Procedure 1.350, Peoples Gas System, Inc. ("Peoples" or the "company"), hereby responds to the Office of Public Counsel's ("OPC") Second Request for Production of Documents (Nos. 42-46), served April 4, 2025 ("OPC's Second POD").

General Objections

1. Peoples objects to each Request for Production in OPC's Second POD ("Request") to the extent that it seeks information that is duplicative, not relevant to the subject matter of this docket, and is not reasonably calculated to lead to the discovery of admissible evidence.

2. Peoples objects to each Request to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such Requests. Peoples will seek clarification from OPC if a request is not clear, but Peoples will produce documents subject to, and without waiving, this objection.

3. Peoples objects to each Request to the extent it requires Peoples to produce information that is already in the public record before the Florida Public Service Commission ("FPSC" or the "Commission"), or the OPC, or other public agency and/or available to OPC through normal procedures or is readily accessible through legal search engines.

4. Peoples objects to each Request to the extent that it calls for data or information protected by the attorney-client privilege, the work product doctrine, the accountant-client

Specific Responses

42. **Budgets.** Please provide all documents identified in Citizens' Second Set of Interrogatories, Interrogatory No. 100 b.

Response:

Peoples' non-confidential electronic documents responsive to this request will be served by posting on the SharePoint or via USB in the folder entitled "POD_2_42."

43. **Forecasting Process.** Please provide all documents identified in Citizens' Second Set of Interrogatories, Interrogatory No. 101.

Response:

The documents in this folder contain proprietary business information. Peoples' confidential electronic documents responsive to this request will be served by posting on the SharePoint or via USB in the folder entitled "CONF_POD_2_43."

The current year long-term forecasting process is ongoing at the time of this response and the resulting long-term forecast has not been submitted to Emera.

44. **Budgets.** Please provide all documents identified in Citizens' Second Set of Interrogatories, Interrogatory No. 102.

Response:

Peoples' did not identify any documents in response to Citizens' Second Set of Interrogatories, No. 102; therefore, there are no documents to provide in response to Production of Documents No. 44.

45. **A&G Capitalization Study.** Please provide all documents identified in Citizens' Second Set of Interrogatories, Interrogatory No. 105.

Response:

The PA Consulting A&G Capitalization study was provided with the written direct testimony of Peoples' witness Andrew Nichols in Exhibit AN-1, Document No. 4, Bates stamped pages 110 to 121, and includes the guidelines, assumptions, methodologies and calculations used to perform the calculation for 2024. A summary comparison of the calculations from 2024 through the 2026 test year is also shown in Document No. 4, Bates stamped page 122. The Excel version of Bates stamped page 122 has been provided in response to OPC's First Request for Production of Documents, No. 5.



2025 and 2026 Budget Calendar of Activities (Condensed)

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PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20250029-GU
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**Peoples Gas 2025 Budget Schedule
DRAFT**

Description	Date
Open BPC Labor App and Planning App 2025 Budget	Thursday, June 6, 2024
2025 PGS Budget Labor Planning	June 6 through July 8, 2024
Business Planning complete 1st Draft of Capex Budget	Monday, July 15, 2024
Receive Emera Allocations - Tentative	Tuesday, July 23, 2024
Business Planning complete Capex Budget Version (2024 6+6 & 2025 Budget)	Wednesday, July 24, 2024
1st Draft of 2025 O&M in BPCw/ Shared Services and Emera Draft Allocations	Thursday, July 25, 2024
ELT Engagement (Status)	
Base and Clause Revenue Budget, including customer growth	Tuesday, August 13, 2024
2nd Draft 2025 O&M Budget in BPCw/ hared Services and Emera Final Allocations	Wednesday, August 14, 2024
Business Planning complete Capex Budget Version (2024 7+5 & 2025 Budget)	Friday, August 16, 2024
O&M Budget Complete in BPC	Friday, August 16, 2024
All other I/S and B/S in BPC (except taxes)	Tuesday, August 20, 2024
ELT Engagement (Status/ Decision)	
Preliminary Balance Sheet & Cash Flows to Treasury for Equity & Debt guidance	Tuesday, August 27, 2024
Preliminary NI/Earnings Package	Friday, August 30, 2024
Business Planning complete Capex Budget inputs on 8+4 in Power Plan	Monday, September 9, 2024
ELT Engagement (Status/ Decision)	
Final NI /Earnings Package	Tuesday, September 17, 2024
Final Cash flow info to Corporate Accounting	Wednesday, September 18, 2024
ELT Engagement (Review)	
Surveillance Report Schedules	Tuesday, September 24, 2024
I/S & B/S in HFM are ready for Emera	Friday, September 27, 2024
1st Draft of Presentation Template	Tuesday, October 1, 2024
Cash Flows in HFM is ready for Emera	Wednesday, October 2, 2024
Final Draft of Presentation Template	Wednesday, October 2, 2024
Presentation Template due to Emera	Monday, October 7, 2024
Earnings Flash Review	Friday, October 4, 2024
Cash Flow Flash Review	Friday, October 4, 2024
Business Review Meeting with Emera	Thursday, October 10, 2024
Change day	Monday, October 14, 2024



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Peoples Gas 2026 Budget Schedule
DRAFT

Description	Date
Finalize interest rate assumptions (LT & ST)	Tuesday, September 24, 2024
Finalize labor and non-labor escalations (merit and CPI)	Tuesday, September 24, 2024
All additional headcount for 2026 received (resource plans)	Tuesday, September 24, 2024
All additional non-labor items above CPI for 2026 received (including BD growth projects)	Tuesday, September 24, 2024
Begin O&M BPC inputs for labor and non-labor (after BPC confirmation)	Monday, October 7, 2024
ELT meeting to go over key O&M assumptions	Monday, October 28, 2024
Finalize labor adjustments to 2026 in labor application	Thursday, October 31, 2024
Finalize adjustments to 2026 Capex in powerplan	Monday, November 4, 2024
Finalize non-labor adjustments to 2026 in planning application	Tuesday, November 5, 2024
Revenue budget complete in BPC (base, misc & other)	Friday, November 8, 2024
All other I/S accounts in BPC (except taxes) (int exp, int inc, prop tax, TOTI, equity earnings, etc)	Friday, November 8, 2024
Deferred clause updated in BPC	Friday, November 8, 2024
Consolidated O&M to business planning team	Friday, November 8, 2024
All other B/S accounts in BPC (except taxes)	Friday, November 8, 2024
Update interest rate assumptions in necessary (LT & ST)	Friday, November 8, 2024
Send tax team preliminary EBIT	Friday, November 8, 2024
2026 tax file from tax team	Tuesday, November 12, 2024
Preliminary equity & debt assumptions for balance sheet & cash flows	Tuesday, November 12, 2024
Preliminary NI/earnings package	Wednesday, November 13, 2024
Preliminary surveillance report (S/R)	Thursday, November 14, 2024
Estimated revenue requirement	Friday, November 15, 2024
ELT Review 2026 Budget	
Thanksgiving Holiday	Thursday, November 28, 2024



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Peoples Gas 2026 Budget Schedule DRAFT

Description	Date
Capital updates entered into powerplan for 2025 & 2026	Friday, December 6, 2024
All revenue, O&M, and deferred updated in BPC for 2026	Tuesday, December 10, 2024
All other I/S & B/S accounts in BPC (except taxes)	Tuesday, December 10, 2024
Final balance sheet & cash flows for equity & debt assumptions	Friday, December 13, 2024
Final NI/earnings package	Monday, December 16, 2024
Preliminary surveillance report (S/R) with Revenue Req	Tuesday, December 17, 2024
2026 Budget meeting with ELT	
Christmas Holiday	Wednesday, December 25, 2024
Complete Roll Forward of 2026 budget using year-end 2024 data for O&M, and balance sheet acc	Friday, January 17, 2025
<i>MLK Holiday</i>	<i>Monday, January 20, 2025</i>
Roll forward tax model (2026 budget using 2024 year end data and revised 2025 balance sheet	Thursday, January 23, 2025
2025 rate case NI/earnings package - final	Monday, January 27, 2025
2025 rate case S/R - final	Friday, January 31, 2025
2026 rate case NI/earnings package - final	Monday, February 3, 2025
2026 rate case S/R - final	Monday, February 3, 2025
File test year letter	Monday, February 3, 2025
Board Approval	February



PEOPLES GAS SYSTEM, INC.
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 OPC'S SECOND REQUEST FOR PODS
 MAY 5, 2025