

May 28, 2024

Ms. A. Shonta Dunston  
Chief Clerk, North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, NC 27699-4300

**VIA ELECTRONIC FILING**

**Re: Biennial Consolidated Carbon Plan and Integrated Resource Plans of Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC, Pursuant to N.C.G.S. § 62-110.9 and § 62-110.1(c)**

**Docket No. E-100, Sub 190**

May 28 2024

Dear Ms. Dunston:

Please find attached for electronic filing with the North Carolina Utilities Commission, the Direct Testimony and Exhibits of Lisa V. Perry on behalf of Walmart Inc. in the above-referenced matter.

All parties are being served a copy of this document in accordance with the attached Certificate of Service.

If you have any questions regarding this filing, please contact me.

Sincerely,



Carrie H. Grundmann (NC Bar No. 52711)

*Counsel for Walmart Inc.*

CHG/sds  
Attachment  
c: Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the Direct Testimony and Exhibits of Lisa V. Perry on behalf of Walmart Inc. has been served this day upon the parties of record in this proceeding by electronic mail.



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Carrie H. Grundmann (NC Bar No. 52711)

Dated: May 28, 2024

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-100, SUB 190

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of: )  
)  
Biennial Consolidated Carbon Plan and )  
Integrated Resource Plans of Duke Energy )  
Carolinas, LLC, and Duke Energy Progress, )  
LLC, Pursuant to N.C.G.S. § 62-110.9 and )  
§ 62-110.1(c) )

**DIRECT TESTIMONY AND EXHIBITS OF**

**LISA V. PERRY**

**ON BEHALF OF**

**WALMART, INC.**

**MAY 28, 2024**

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**Exhibits**

Exhibit LVP-1:	Witness Qualifications Statement
Exhibit LVP-2:	Companies' Response to Public Staff Request No. 21, Item No. 21-9
Exhibit LVP-3:	Companies' Response to CIGFUR Request No. 3, Item No. 3-2

**Appendices**

Appendix A:	Index and Identification of Issues
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1   **I.    Introduction**

2           **Q.    PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND**  
3           **OCCUPATION.**

4           A.    My name is Lisa V. Perry. My business address is 2608 SE J Street, Bentonville,  
5                Arkansas 72716. I am employed by Walmart Inc. ("Walmart") as Director, Utility  
6                Partnerships - Regulatory.

7           **Q.    ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS DOCKET?**

8           A.    I am testifying on behalf of Walmart.

9           **Q.    PLEASE DESCRIBE YOUR EDUCATION AND EXPERIENCE.**

10          A.    I received a J.D. in 1999 and a L.L.M. in Taxation in 2000 from the University of  
11                Florida Levin College of Law. From 2001 to 2019, I was in private practice with an  
12                emphasis from 2007 to 2019 in Energy Law. My practice included representing a  
13                large commercial client before the utility regulatory commissions in Colorado,  
14                Texas, New Mexico, Arkansas, and Louisiana in matters ranging from general rate  
15                cases to renewable energy programs. I joined the energy department at Walmart in  
16                September 2019 as Senior Manager, Energy Services. My Witness Qualifications  
17                Statement is attached as Exhibit LVP-1.

18          **Q.    HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE**  
19          **NORTH CAROLINA UTILITIES COMMISSION ("COMMISSION")?**

20          A.    No, I have not.

21

1           **Q.    HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER**  
2           **STATE REGULATORY COMMISSIONS?**

3           A.    Yes, I have submitted testimony with state regulatory commissions for Arkansas,  
4                   Colorado, Connecticut, Florida, Georgia, Iowa, Illinois, Indiana, Kansas, Kentucky,  
5                   Louisiana, Maryland, Michigan, New York, Ohio, Oklahoma, South Carolina,  
6                   Texas, Virginia, and Wyoming. I have also provided legal representation for  
7                   customer stakeholders before the state regulatory commissions for Colorado, Texas,  
8                   Arkansas, Louisiana, and New Mexico in the cases listed under "Commission  
9                   Dockets" in Exhibit LVP-1.

10          **Q.    ARE YOU SPONSORING EXHIBITS IN YOUR TESTIMONY?**

11          A.    Yes. I am sponsoring the Exhibits listed in the Table of Contents. In compliance  
12                   with Ordering Paragraph 1 of the Commission's February 21, 2024, Order  
13                   Establishing Additional Procedures for Witness Hearing, I am also sponsoring  
14                   Appendix A, which identifies the topics being addressed herein as well as the  
15                   corresponding portion(s) of the Companies' filing to which I am responding.

16          **Q.    PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS IN NORTH**  
17          **CAROLINA.**

18          A.    As shown on Walmart's website, Walmart operates 214 retail units, six distribution  
19                   centers, one fulfillment center, and employs over 61,000 associates in North  
20                   Carolina. In fiscal year ending 2024, Walmart purchased approximately \$9.2 billion

1 dollars of goods and services from North Carolina-based suppliers, supporting over  
2 86,000 supplier jobs.<sup>1</sup>

3 **Q. PLEASE BRIEFLY DESCRIBE WALMART'S OPERATIONS WITHIN**  
4 **THE NORTH CAROLINA SERVICE TERRITORY FOR DUKE ENERGY**  
5 **CAROLINAS, LLC ("DEC") AND DUKE ENERGY PROGRESS, LLC**  
6 **("DEP") (COLLECTIVELY, "COMPANIES").**

7 A. Within the North Carolina service territory for DEC, Walmart has 144 retail stores,  
8 five distribution centers, and related facilities. Additionally, Walmart has 65 retail  
9 stores, two distribution centers, and related facilities located in the North Carolina  
10 service territory for DEP.

11  
12 **II. Purpose of Testimony and Summary of Recommendations**

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

14 A. The purpose of my testimony is to respond to the Companies' *Verified Petition for*  
15 *Approval of 2023-2024 Carbon Plan and Integrated Resource Plans of Duke*  
16 *Energy Carolinas, LLC and Duke Energy Progress, LLC* filed on August 17, 2023  
17 ("Petition"), as amended on January 31, 2024, by the Companies' *Verified Amended*  
18 *Petition for Approval of 2023-2024 Carbon Plan and Integrated Resource Plans of*  
19 *Duke Energy Carolinas, LLC and Duke Energy Progress, LLC* ("Amended  
20 Petition"), along with supporting testimony and documents, in which the  
21 Companies are seeking approval of the Companies' 2023-2024 Carbon Plan and

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<sup>1</sup> <https://corporate.walmart.com/about/location-facts/united-states/north-carolina>

1 Integrated Resource Plans ("CPIRP") as supplemented by the Companies through  
2 additional filings in this docket. Specifically, my testimony addresses the  
3 Companies' demand-side programs and proposed increase in its capacity reserve  
4 margin.

5 **Q. PLEASE SUMMARIZE WALMART'S RECOMMENDATIONS TO THE**  
6 **COMMISSION.**

7 A. Walmart makes the following recommendations to the Commission:

- 8 (1) Walmart acknowledges the Companies' efforts thus far in meeting  
9 with interested customers to develop attractive demand-side  
10 programs that encourage customer participation; however, Walmart  
11 does not believe that the Companies are moving expeditiously  
12 enough to consider and propose new programs. Particularly in light  
13 of the Commission's most recent approval of revisions to the  
14 demand-side management ("DSM") and energy efficiency ("EE")  
15 Mechanism ("DSM/EE Mechanism"), Walmart believes that the  
16 Commission should take definitive steps to expeditiously require the  
17 Companies to collaborate with interested stakeholders to develop  
18 new and innovative solutions that leverage customer resources and  
19 reduce the need to build additional generation capacity. Efforts to  
20 shrink the challenge should be occurring as quickly, if not more  
21 quickly, than the Companies are proposing to invest billions of  
22 dollars in building new generation resources.



**Direct Testimony of Lisa V. Perry  
Walmart Inc.  
North Carolina Utilities Commission Docket No. E-100, Sub 190**

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- 1                   (2)    To ensure customer-sited generation technology is available to help  
2                                   the Companies meet projected load growth and avoid generation  
3                                   shortfalls, the Commission should require the Companies to  
4                                   collaborate with interested stakeholders in order to develop  
5                                   programs that support customer investment in at least 600 MW of  
6                                   on-site generation. Depending on the future development of – or  
7                                   delays in – advanced nuclear generation, the Commission may want  
8                                   to increase the amount of customer-sited generation that could be  
9                                   developed. The Companies should seek Commission approval for  
10                                  an initial 600 MW of customer-sited generation within 120 days of  
11                                  any Final Order in this docket.
- 12                   (3)    The Commission should conduct a thorough review of the  
13                                   Companies' proposal to raise their reserve margin to 22 percent,  
14                                   particularly in light of the resulting financial impact to customers. If  
15                                   the Commission approves an increase in the Companies' reserve  
16                                   margin, this increase should be limited to the minimum amount  
17                                   necessary to maintain the Companies' ability to deliver adequate and  
18                                   reliable service.

1           **Q.    DOES THE FACT THAT YOU MAY NOT ADDRESS AN ISSUE OR**  
2           **POSITION   ADVOCATED   BY   THE   COMPANIES   INDICATE**  
3           **WALMART'S SUPPORT?**

4           A.    No. The fact that an issue is not addressed herein should not be construed as an  
5           endorsement of, agreement with, or consent to any filed position.

6  
7   **III.   Description of Proposed CPIRP**

8           **Q.    CAN YOU PROVIDE A GENERAL DESCRIPTION OF THE PROPOSED**  
9           **CPIRP?**

10          A.    Yes. The Companies are seeking approval of the second iteration of their Carbon  
11          Plan in this Integrated Resource Plan. The Companies' initial Carbon Plan was  
12          approved by the Commission by Order dated December 30, 2022, in Docket No.  
13          E-100, Sub 179 ("Initial Carbon Plan Order"). I understand that the CPIRP is  
14          designed to comply with North Carolina's IRP statute and Carbon Plan  
15          requirements, as well as Commission rules and directives addressing both areas,  
16          some of which were ordered by the Commission in its Initial Carbon Plan Order.<sup>2</sup>  
17          Additionally, since the Companies also serve customers in South Carolina, the  
18          Companies made a separate filing in South Carolina<sup>3</sup> and presented the CPIRP as a  
19          unified and coordinated plan with separate chapters for each state, addressing their

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<sup>2</sup> See Petition, p. 4, ¶ 5.

<sup>3</sup> *Duke Energy Progress, LLC's 2023 Integrated Resource Plan (IRP)*, Public Service Commission of South Carolina ("SC PSC"), Case No. 2023-8-E and *Duke Energy Carolinas, LLC's 2023 Integrated Resource Plan (IRP)*, SC PSC Case No. 2023-10-E.

1           respective legal requirements.<sup>4</sup> Overall, the CPIRP outlines the supply-side and  
2           demand-side resources the Companies claim are necessary to provide reliable  
3           service to their customers over a 15-year planning horizon (2024-2038), referred to  
4           as the "Base Planning Period"<sup>5</sup> while also complying with the legal mandates set  
5           forth in House Bill ("HB") 951.

6  
7           **Q.     WHAT ARE THE COMPANIES PROPOSING IN THEIR CPIRP?**

8           A.     Based on the Companies' filing, it is my understanding that the Companies'  
9           originally filed CPIRP proposes three distinct "Energy Transition Pathways" to  
10          meet the 70% interim target set by HB 951.<sup>6</sup> Each pathway includes a combination  
11          of (i) near-term supply-side resources, (ii) long-lead time supply-side resources,  
12          and (iii) demand-side programs to "shrink the challenge."<sup>7</sup> Although each Energy  
13          Transition Pathway relies on similar base assumptions, they differ in their pace,  
14          scope, and scale of resources as well as the date by which they meet the 70% interim  
15          target.<sup>8</sup> My testimony will focus on the demand-side programs proposed by the  
16          Companies in the Energy Transition Pathways, including the Companies' preferred  
17          Pathway 3.<sup>9</sup>

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<sup>4</sup> See Petition, p. 7, ¶ 10 and p. 8, ¶ 12.

<sup>5</sup> See *id.* at 7, ¶ 10.

<sup>6</sup> See Petition, pp. 11-12, ¶ 20.

<sup>7</sup> See *id.*

<sup>8</sup> See *id.* at 12, ¶ 21.

<sup>9</sup> See *id.* (describing Pathway 3 as the "most reasonable, lease cost, and least risk pathway" for meeting interim targets).

1           **Q.    HOW DOES THE COMPANIES' SUPPLEMENTAL CPIRP MODIFY THE**  
2           **ORIGINALLY FILED CPIRP?**

3           A.    The Companies' conducted a Supplemental Planning Analysis following its filing  
4           of the initial CPIRP in this docket that, according to the Companies, identified a  
5           need for additional near-term supply-side development and procurement activities  
6           for the 2024-2026 timeframe for which the Company is now seeking approval in  
7           this case through the Companies' updated Near-Term Action Plan ("NTAP").<sup>10</sup>

8           **Q.    WHY DID THE COMPANIES CONDUCT A SUPPLEMENTAL**  
9           **PLANNING ANALYSIS?**

10          A.    According to the Companies, since filing their initial CPIRP in this docket, which  
11          relied upon modeling from May 2023, they have experienced unprecedented  
12          economic growth in their service territory, resulting in substantial and material  
13          changes to their original load forecast warranting an update to their modeling and  
14          analysis.<sup>11</sup>

15          **Q.    FOLLOWING THE SUPPLEMENTAL PLANNING ANALYSIS, DO THE**  
16          **COMPANIES CONTINUE TO SUPPORT PATHWAY 3 AS THE**  
17          **PREFERRED PATHWAY?**

18          A.    Yes, they do. Specifically, the Companies recommend that the Commission  
19          approve their proposed Pathway 3, Portfolio P3 Fall Base, as developed through  
20          the Supplemental Planning Analysis.<sup>12</sup>

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<sup>10</sup> See Supplemental Testimony of Kendal C. Bowman, p. 3, line 15 to p. 4, line 2.

<sup>11</sup> See Amended Petition, p. 11, ¶ 19.

<sup>12</sup> See *id.* at 15, ¶ 25.

1 **IV. Energy Transition Pathways – Demand-Side Solutions**

2 **Q. WHAT IS YOUR UNDERSTANDING OF THE DEMAND-SIDE**  
3 **SOLUTIONS THE COMPANIES ARE PROPOSING AS PART OF THEIR**  
4 **ENERGY TRANSITION PATHWAYS?**

5 A. In addition to proposing additional supply-side resources, I understand that the  
6 Companies are also including demand-side resources in each Energy Transition  
7 Pathway, including their preferred Pathway 3.<sup>13</sup> This includes what the Companies  
8 refer to as "Grid Edge Resources" to manage and reduce the load that would  
9 otherwise require additional generation resources, or, in other words, "shrink the  
10 challenge".<sup>14</sup>

11 **Q. HOW DO THE COMPANIES PROPOSE TO SHRINK THE CHALLENGE?**

12 A. The Companies are proposing to manage customer load through two initiatives:  
13 Grid Edge and Customer Programs.<sup>15</sup> Together, the Companies claim that these two  
14 initiatives will "influence load and shrink the energy transition challenge by  
15 reducing, optimizing, and shifting energy consumption."<sup>16</sup> They describe Grid  
16 Edge as "technologies, programs, and investments that advance a decentralized,  
17 distributed, and two-way grid."<sup>17</sup> By contrast, Customer Programs seem to focus  
18 on clean energy options for customers as well as demand-side tools.<sup>18</sup> Through

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<sup>13</sup> See Amended Petition, p. 14, ¶ 24.

<sup>14</sup> See *id.*

<sup>15</sup> See Direct Testimony of Timothy J. Duff and Jonathan L. Byrd, p. 6, lines 3-8.

<sup>16</sup> CPIRP, Chapter 1, Planning for a Changing Energy Landscape, p. 13, Table 1-2.

<sup>17</sup> See Direct Testimony of Timothy J. Duff and Jonathan L. Byrd, p. 6, lines 8-9.

<sup>18</sup> CPIRP, Chapter 1, Planning for a Changing Energy Landscape, p. 13, Table 1-2.

1           these two initiatives, the Companies seek to reduce customer usage, modify load  
2           patterns, and provide customers with more tools to manage their energy  
3           consumption.<sup>19</sup>

4           **Q.   SPECIFICALLY, WHAT DO THESE GRID EDGE AND CUSTOMER**  
5           **PROGRAMS INCLUDE?**

6           A.   It is my understanding that these initiatives will include – at least in this iteration  
7           of the CPIRP – certain rate designs, voltage control, customer programs including  
8           DSM/EE programs, renewable energy programs, electric transportation programs,  
9           and voltage optimization.<sup>20</sup>

10  
11   **V.   Walmart's Sustainability Goals**

12           **Q.   HAS WALMART ESTABLISHED CORPORATE SUSTAINABILITY**  
13           **GOALS THAT INCLUDE CLEAN ENERGY AND CARBON REDUCTION**  
14           **GOALS?**

15           A.   Yes, it has. Walmart has long had aggressive and significant company-wide  
16           renewable energy goals, and on September 21, 2020, Walmart revised its targets as  
17           a part of its sustainability goals, including: (1) to be supplied 100 percent by  
18           renewable energy by 2035 and (2) zero carbon emissions in its operations, including  
19           its transportation fleet vehicles, without the use of offsets, by 2040. Walmart has  
20           also set a goal to transition to zero emission buildings by deploying low-impact

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<sup>19</sup> See Direct Testimony of Timothy J. Duff and Jonathan L. Byrd, p. 6, lines 15-18.

<sup>20</sup> See Direct Testimony of Timothy J. Duff and Jonathan L. Byrd, p. 10, lines 12-15.

1 refrigerants for cooling and electric equipment for heating by 2040.<sup>21</sup> Additionally,  
2 on January 9, 2024, Walmart announced a new goal to bring 10 GW of 13 new clean  
3 energy projects online by the end of 2030, including 1 GW of new on-site solar plus  
4 storage, and enabling 2 GW of new community solar projects.<sup>22</sup>

5 To date, Walmart has contracted for or currently takes electricity from one  
6 or more renewable resources in at least 29 states and Puerto Rico.

7 **Q. WHAT CHANNELS DOES WALMART UTILIZE TO SECURE CLEAN**  
8 **ENERGY RESOURCES?**

9 A. To meet its clean energy goals, Walmart utilizes three primary channels to secure  
10 resources:

- 11 • **Development of off-site resources:** These products are typically structured  
12 to replace other energy, both physically and on the bill. This mechanism  
13 allows Walmart to leverage its scale to drive the best project economics  
14 while simultaneously minimizing transaction time and costs. To date,  
15 Walmart has contracted for these resources in deregulated markets through  
16 Texas Retail Energy, LLC, a competitive electric supplier wholly owned by  
17 Walmart that serves as its electric supplier in most deregulated retail  
18 markets, to directly serve its load. Walmart has also entered into "Virtual  
19 PPAs" and "Renewable Energy Certificate ("REC") Agreements" in  
20 deregulated wholesale markets for clean energy assets. These contracts do

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<sup>21</sup> *Walmart Sets Goal to Become a Regenerative Company*, Walmart, Sept. 21, 2020, <https://corporate.walmart.com/news/2020/09/21/walmart-sets-goal-to-become-a-regenerative-company>.

<sup>22</sup> *Walmart Keynote at CES 2024*, Walmart (Jan. 9, 2024), [https://tech.walmart.com/content/dam/walmart-global-tech/documents/Walmart%20CES%20Keynote%20Script%20Transcript\\_1.9.24.pdf](https://tech.walmart.com/content/dam/walmart-global-tech/documents/Walmart%20CES%20Keynote%20Script%20Transcript_1.9.24.pdf).

**Direct Testimony of Lisa V. Perry**  
**Walmart Inc.**  
**North Carolina Utilities Commission Docket No. E-100, Sub 190**

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1 not directly serve Walmart's load but allow it to bring new large-scale  
2 renewable resources to the market by entering into long-term financial  
3 agreements for clean energy power and environmental attributes. Walmart  
4 will also sign up its facilities for offsite community solar program  
5 subscriptions in jurisdictions where those programs are offered. Through  
6 these programs, Walmart sites will subscribe to an allocation of a shared  
7 offsite solar installation and receive bill credits based on their subscription  
8 size, facility power usage, and their eligible utility expenses. In addition to  
9 community solar program participation, Walmart is also working to make  
10 clean energy accessible and affordable for its customers and members, as  
11 part of its commitment to unlock 2 GW of new community solar projects  
12 around the United States. As an example, Walmart recently announced its  
13 investment in seven community solar projects in Illinois and New York,  
14 which will serve low-to-moderate income households, public schools, and  
15 religious institutions, among others.

- 16 • **Development of on-site resources:** Walmart is currently developing and  
17 will own on-site, behind-the-meter ("BTM") resources, and has also  
18 contracted resources through Power Purchase Agreements ("PPAs") and  
19 leases that allow performance guarantees. These resources replace grid  
20 energy with the expectation that the operating costs for the site are reduced.
- 21 • **Utility partnerships:** Walmart works with its utility partners to develop  
22 useable commercial and industrial programs and economic structures



1 targeted to function within the confines of the regulatory compact and with  
2 minimal impact to non-participating customers. When this option is  
3 pursued, Walmart works to ensure that programs it assists in developing can  
4 be used by broader groups of customers, not merely by Walmart. Walmart  
5 is unique in the large commercial space because it has significant in-house  
6 rate and regulatory expertise that it is willing to leverage to create  
7 opportunities to move the entire industry forward. Walmart currently  
8 participates in programs with 20 utilities across the United States. The  
9 largest of these partnerships that have been executed to date include the  
10 development of and participation in Duke Energy Florida, LLC's Clean  
11 Energy Connection Program, Florida Power & Light Company's  
12 SolarTogether Program, Georgia Power Company's Renewable Energy  
13 Development Initiative, and Entergy Louisiana's Geaux Green program.  
14 While Walmart assisted in developing these opportunities, the opportunities  
15 are open to other interested large customers, not just Walmart.

16  
17 **VI. Customer Programs**

18 **Q. YOU MENTIONED THAT THE COMPANIES ARE RELYING ON**  
19 **CUSTOMER PROGRAMS, INCLUDING DSM/EE PROGRAMS, TO**  
20 **SHRINK THE CHALLENGE. PLEASE EXPLAIN.**

21 **A.** On the front end, before determining the type or amount of resources needed, the  
22 Companies rely upon DSM/EE and Grid Edge to reduce load. The Companies'

1 Initial Carbon Plan noted the importance of these resources to meet the ambitious  
2 goals of HB 951, and the Initial Carbon Plan Order also indicated the importance  
3 of these resources. I understand that in response to certain requirements set forth by  
4 the Commission in its Initial Carbon Plan Order, the Companies were ordered to  
5 review the DSM/EE Mechanism that allows for the recovery of the Companies'  
6 current suite of DSM/EE programs.<sup>23</sup> In compliance with the Commission  
7 directive, the Companies' conducted a series of stakeholder meetings to review the  
8 issues identified by the Initial Carbon Plan Order and to consider changes to the  
9 DSM/EE Mechanism. Following approval of the DSM/EE Mechanism, the  
10 Companies plan to expand their DSM/EE offerings.<sup>24</sup>

11 **Q. DID THE COMPANIES IDENTIFY ANY HURDLES WITH EXPANDING**  
12 **THEIR DSM/EE PROGRAMS AS ORDERED BY THE COMMISSION IN**  
13 **ITS INITIAL CARBON PLAN ORDER?**

14 A. Yes. The Companies' claimed that the prior DSM/EE Mechanism hindered their  
15 ability to adopt certain DSM/EE measures. In response to these hurdles, on April  
16 23, 2023, the Companies initiated a process to update the DSM/EE Mechanism.  
17 The Companies contended that adoption of a revised DSM/EE Mechanism "will  
18 enable the Companies to achieve greater load reduction through their DSM/EE  
19 programs, resulting in more potential for customers to save energy and manage  
20 their electricity bills."<sup>25</sup>

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<sup>23</sup> See Direct Testimony of Timothy J. Duff and Jonathan L. Byrd, p. 14, lines 3-13.

<sup>24</sup> See *id.* at 14, lines 13-15.

<sup>25</sup> CPIRP, Appendix H, Grid Edge and Customer Programs, p. 13.

1           **Q.     WHAT IS THE STATUS OF THE COMPANIES' PROPOSED REVISIONS**  
2           **TO THE DSM/EE MECHANISM?**

3           A.     On May 22, 2024, the Commission entered an Order adopting all of the Companies'  
4           supported changes to the DSM/EE Mechanism as negotiated with parties over  
5           several months in that docket.<sup>26</sup>

6           **Q.     DOES WALMART PARTICIPATE IN THE COMPANIES' CURRENT**  
7           **DSM/EE PROGRAMS?**

8           A.     No, it does not. Walmart has elected to opt-out of these programs as permitted by  
9           North Carolina law.<sup>27</sup> And Walmart is not unique in electing to opt-out of  
10          Companies' sponsored DSM/EE. In fact, according to the Companies, over 35  
11          percent of their retail load is opted out of the EE programs.<sup>28</sup> Elsewhere in the  
12          Companies' filing, their analysis suggests that 48 percent of commercial sales and  
13          77 percent of industrial sales in DEC's territory opt out.<sup>29</sup> In DEP's service territory,  
14          44 percent of commercial sales and 74 percent of industrial sales elect to opt out.<sup>30</sup>

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<sup>26</sup> *In the Matter of Application of Carolina Power & Light Company, d/b/a Progress Energy Carolinas, Inc., for Approval of Demand-Side Management and Energy Efficiency Cost Recovery Rider Pursuant to G.S. 62-133-.9 and Commission Rule R8-69 and In the Matter of Petition of Duke Energy Carolinas, LLC, for Approval of Modifications to Residential Service Load Control Rider*, Docket Nos. E-2, Sub 931 and E-7, Sub 1032, Order Approving Revisions to Demand Side Management and Energy Efficiency Cost Recovery and Utility Incentive Mechanisms (May 22, 2024).

<sup>27</sup> See N.C. Gen. Stat. § 62-133.9.

<sup>28</sup> See Direct Testimony of Timothy J. Duff and Jonathan L. Byrd, p. 19, lines 17-19.

<sup>29</sup> Direct Testimony of Timothy J. Duff and Jonathan L. Byrd, Exhibit 1 (North Carolina Market Potential Study), pp. 19-20, § 3.5.3.

<sup>30</sup> *Id.* at 23-24, § 3.6.3.

1           **Q.     WHY HAS WALMART HISTORICALLY ELECTED TO OPT OUT OF**  
2           **THE COMPANIES' CURRENT SUITE OF DSM/EE PROGRAMS?**

3           A.     While the types of DSM/EE programs offered by the Companies generally align  
4           with Walmart's sustainability goals, which, from an EE perspective, include  
5           implementing various energy-efficient equipment in its retail stores, distribution  
6           centers, and other facilities, participation in a particular program depends on  
7           whether the program can sufficiently offset some of the costs associated with  
8           transitioning to more energy-efficient equipment and operations. From a cost-  
9           benefit perspective, the incentive available under the program must exceed (or  
10          present the potential to exceed) the cost to participate in the program, or in the  
11          Companies' case, opt in to paying all the allocated costs under the Companies'  
12          applicable rider. In Walmart's experience, the costs of opting in exceed by orders  
13          of magnitude the potential benefit making it more cost effective for Walmart to opt  
14          out of these programs and, in the case of EE, to implement such measures on its  
15          own dime and timeline. The cost-benefit aspect is equally applicable to DSM  
16          programs offered by the Companies; however, an additional factor limiting  
17          Walmart's participation in Companies' sponsored DSM programs is the technical  
18          feasibility. Quite simply, the question is whether Walmart is able to provide the  
19          types of demand response called for by any program. Walmart raised many of these  
20          issues in the context of the Companies' now-concluded DSM/EE Mechanism  
21          docket.

1           **Q.     WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION**  
2                   **WITH REGARD TO THE COMPANIES' INITIATIVES TO SHRINK THE**  
3                   **CHALLENGE INCLUDING CUSTOMER PROGRAMS SUCH AS DSM/EE**  
4                   **PROGRAMS?**

5           A.     Walmart agrees with the Commission and the Companies on the importance of  
6                   developing robust customer-driven programs to manage customer demand, such as  
7                   customer-sited solutions, as discussed earlier in my testimony. Additionally,  
8                   programs that offer sufficient value to customers investing in energy-efficient  
9                   equipment or reducing load during times of grid stress will be crucial as the  
10                  Companies strive to meet increasing demand reliably and affordably. Walmart  
11                  acknowledges the Companies' efforts thus far in meeting with interested customers  
12                  to develop attractive programs that encourage customer participation; however,  
13                  Walmart does not believe that the Companies are moving expeditiously enough to  
14                  consider and propose new programs. Despite the fact that the Commission's Initial  
15                  Carbon Plan Order, which emphasized the importance of DSM/EE, was issued  
16                  nearly 18 months ago, the Companies state that they are "still [only] in the initial  
17                  phases of evaluating different potential new customer programs."<sup>31</sup> Walmart  
18                  believes that the Commission should take definitive steps to require the Companies  
19                  to continue collaborating with interested stakeholders to develop new and  
20                  innovative solutions that leverage customer resources and reduce the need to build  
21                  additional generation capacity expeditiously. Efforts to shrink the challenge should

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<sup>31</sup> See Exhibit LVP-2, Companies' Response to Public Staff Data Request No. 21, Item No. 21-9.

1           be occurring as quickly, if not more quickly, than the Companies' are proposing to  
2           invest billions of dollars in building new generation resources.<sup>32</sup> Since the amount  
3           of new generation needed is based on the amount of system load, it seems obvious  
4           that reducing the load needed to be served should be a top issue for the Companies  
5           and this Commission.

6  
7   **VII. Customer-Sited Generation Solutions**

8           **Q.    IN ADDITION TO THE CUSTOMER PROGRAMS DISCUSSED ABOVE,**  
9           **HAVE THE COMPANIES EXPLORED ANY OTHER CUSTOMER-BASED**  
10          **SOLUTIONS TO ADDRESS LOAD GROWTH?**

11          A.    In the Amended Petition, the Companies claim a need for additional near-term  
12          supply-side resources in order to meet the increase in forecasted load. In order to  
13          serve what the Companies call "new economic development customers," the  
14          Companies state a willingness to work with these new customers to find solutions  
15          that "optimize the amount new resources on the system to serve their load," which  
16          could include customer-sited generation.<sup>33</sup>

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<sup>32</sup> It is more important than ever to utilize existing resources in light of the Companies' claim that "overnight capital costs range from 20% to 60% higher" since the Companies' 2022 Carbon Plan proceeding. *See* CPIRP, Chapter 1, Planning for a Changing Energy Landscape, p. 10; *see also* Chapter 4, Execution Plan, p. 40, noting difficulties with third-party resources delaying commercial delivery dates, terminating their contracts, or dropping from the interconnection queue.

<sup>33</sup> *See* Supplemental Direct Testimony of Glen A. Snider, p. 10, lines 9-14.

1           **Q.    DOES WALMART AGREE WITH THE COMPANIES' PLAN TO FOCUS**  
2           **ON PERMITTING ONLY NEW CUSTOMERS TO POTENTIALLY**  
3           **INVEST IN CUSTOMER-SITED GENERATION?**

4           A.    No. Walmart does not believe this type of resource should be limited to or focused  
5           solely on new customers.

6           **Q.    DOES WALMART HAVE AN INTEREST IN INVESTING IN CUSTOMER-**  
7           **SITED GENERATION?**

8           A.    Yes, it does. As mentioned earlier, Walmart is exploring various pathways to meet  
9           its sustainability goals, including customer-sited generation such as solar plus  
10          storage, community solar, fuel cell technology, and other dispatchable resources  
11          located on or near the customer's premises. Specifically, Walmart announced earlier  
12          this year its goal to bring 1 GW of new on-site solar plus storage and 2 GW of new  
13          community solar projects. Walmart believes that leveraging customer resources and  
14          capital to invest in these types of technologies is crucial. This approach can  
15          diversify the Companies' generation mix while providing clean power, supporting  
16          both individual customer goals and the Companies' overall plan to meet its growing  
17          forecasted load. There is no reason that customer-sited generation should be limited  
18          to new customers when existing customers, like Walmart, also have an interest in  
19          such resources.

1           **Q.    HOW DOES CUSTOMER-SITED GENERATION INTEGRATE WITH**  
2           **THE GENERATION ASSETS THE COMPANIES ARE PROPOSING AS**  
3           **PART OF THEIR CPIRP?**

4           A.    Incorporating distributed, smaller, and less capital-intensive assets into the  
5           Companies' system will not only diversify the overall resource mix for meeting  
6           customer energy needs but also serve as a backup when utility-owned resources are  
7           unavailable. As an example, it is my understanding that the Companies' preferred  
8           Pathway 3, Portfolio P3 Fall Base includes building 0.6 GW/600 MW of advanced  
9           nuclear power by January 1, 2035.<sup>34</sup> This is just the first of what is expected to be  
10          multiple additions of nuclear power that the Companies intend to develop. Given  
11          the early stage of nuclear technology development, particularly small-scale nuclear,  
12          a 2035 timeline may be ambitious and potentially unattainable. A delay in the first  
13          in-service date for small scale nuclear would have a cascading impact on the  
14          Companies' plans to meet the ambitious goals of HB 951. In such cases, customer-  
15          sited generation can bridge the gap until nuclear power becomes fully operational.  
16          This illustrates how customer-sited generation can complement other resources,  
17          ensuring reliable power for all customers.

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<sup>34</sup> See CPIRP, Chapter NC Supplement: 2023-2024 Carbon Plan and Integrated Resource Plan Supplemental Planning Analysis, p. 3.



1           **Q.     WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION**  
2           **REGARDING CUSTOMER-SITED GENERATION ASSETS?**

3           A.     To ensure customer-sited generation technology is available to help the Companies  
4           meet projected load growth and avoid generation shortfalls, the Commission should  
5           require the Companies to collaborate with interested stakeholders in order to  
6           develop programs that support customer investment in at least 600 MW of on-site  
7           generation. Depending on the future development – or delays – of advanced nuclear  
8           generation, the Commission may want to increase the amount of customer-sited  
9           generation that could be developed. The Companies should seek Commission  
10          approval for an initial 600 MW of customer-sited generation within 120 days of any  
11          Final Order in this docket.

12  
13   **VIII. Resource Adequacy Study**

14          **Q.     AS PART OF THEIR CPIRP, DID THE COMPANIES PERFORM A**  
15          **RESOURCE ADEQUACY STUDY?**

16          A.     Yes; it is my understanding that the Companies engaged a third party, Astrapé, to  
17          evaluate the Companies planning reserve margin needs for its CPIRP by conducting  
18          a Resource Adequacy Study.<sup>35</sup>

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<sup>35</sup> See Direct Testimony of Richard Nicholas Wintermantel and Cole Michael Benson, p. 7, lines 7-11 (Astrapé also conducted a study to determine wind Effective Load Carrying Capability ("ELCC") values for expansion planning modeling).

1           **Q.     WHAT DOES ASTRAPÉ RECOMMEND BASED ON THE RESULTS OF**  
2           **THE RESOURCE ADEQUACY STUDY?**

3           A.     According to Astrapé, increasing winter load and associated planning that is needed  
4           because of the high penetration of solar on the Companies' system that provide  
5           insufficient generation during the early morning winter peaks, increased winter  
6           load volatility, and lack of import resources from neighboring states during the  
7           winter months, support an increase in the Companies' winter reserve margin from  
8           17 percent to a 22 percent minimum for IRP purposes,<sup>36</sup> a nearly 30 percent increase  
9           in the Companies' planning reserve margin.

10          **Q.     WHAT IS WALMART'S RESPONSE TO THE COMPANIES' PROPOSED**  
11          **INCREASE IN THEIR WINTER RESERVE MARGIN?**

12          A.     As a customer providing needed goods and jobs to the communities it serves,  
13          reliable and affordable access to electricity is of critical importance. While Walmart  
14          does not adopt a specific stance on the Companies' proposal to increase its winter  
15          reserve margin, it acknowledges and has concerns regarding the significance – and  
16          costliness – of this issue. Considering, as a geographically close comparator, the  
17          current reserve margin of 17.7 percent for PJM,<sup>37</sup> Walmart stresses the importance  
18          of considering the potential financial impact on all customers of constructing  
19          additional generation to meet this five percent increase in reserves.

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<sup>36</sup> See Direct Testimony of Richard Nicholas Wintermantel and Cole Michael Benson, p. 11, lines 18-21, p. 12, lines 3-6, and p. 12, lines 18-20.

<sup>37</sup> 2023 PJM Reserve Requirement Study, Oct. 3, 2023, <https://www.pjm.com/-/media/committees-groups/committees/mrc/2023/20231025/20231025-item-02---2-2023-pjm-reserve-requirement-study-report-final.ashx>.

1           **Q.     WHAT IS WALMART'S RECOMMENDATION TO THE COMMISSION**  
2                   **WITH REGARD TO THE COMPANIES' PROPOSAL TO INCREASE**  
3                   **THEIR RESERVE MARGIN FROM 17 PERCENT TO 22 PERCENT?**

4           A.     The Commission should conduct a thorough review of the Companies' proposal to  
5                   raise their reserve margin to 22 percent, particularly in light of the financial impact  
6                   to customers.<sup>38</sup> If the Commission approves an increase in the Companies' reserve  
7                   margin, this increase should be limited to the minimum amount necessary to  
8                   maintain the Companies' ability to deliver adequate and reliable service.

9           **Q.     DOES THIS CONCLUDE YOUR TESTIMONY?**

10          A.     Yes.

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<sup>38</sup> See Supplemental Planning Analysis, p. 11, Fig. SPA 1-3; see also Exhibit LVP-3, Companies' Response to CIGFUR Request No. 3, Item No. 3-2 (confirming that the compound annual growth rate ("CAGR") in customer bills for commercial and industrial ("C&I") customers through 2033 and 2038 is in the range of 2.5 percent (P3 Base) to more than 4 percent (P3 Fall Base)).

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-100, SUB 190

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of: )  
)  
Biennial Consolidated Carbon Plan and )  
Integrated Resource Plans of Duke Energy )  
Carolinas, LLC, and Duke Energy Progress, )  
LLC, Pursuant to N.C.G.S. § 62-110.9 and )  
§ 62-110.1(c) )

**EXHIBITS OF**  
**LISA V. PERRY**  
**ON BEHALF OF**  
**WALMART, INC.**

STATE OF NORTH CAROLINA  
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§ 62-110.1(c) )

**EXHIBIT LVP-1 OF**

**LISA V. PERRY**

**ON BEHALF OF**

**WALMART, INC.**

# Lisa V. Perry

Director, Utility Partnerships - Regulatory  
Walmart Inc.

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## EXPERIENCE

September 2023 – Present

Walmart Inc., Bentonville, AR

Director, Utility Partnerships - Regulatory

September 2019 – September 2023

Walmart Inc., Bentonville, AR

Senior Manager, Energy Services

November 2017 – September 2019

Oram & Houghton PLLC, Round Rock, TX

Of Counsel, Energy Law

February 2016 – November 2017

Ray Quinney & Nebeker, P.C., Salt Lake City, UT

Of Counsel, Energy Law

September 2007 – February 2016

Welborn, Sullivan, Meck & Tooley, P.C., Denver, CO

Partner, Energy Law

## EDUCATION

2000 University of Florida Levin College of Law LL.M., Taxation

1999 University of Florida Levin College of Law J.D.

1996 University of South Florida B.A., Criminology

1993 University of South Florida B.A., Psychology

## FILED TESTIMONY

### 2024

Public Utility Commission of Texas Docket No. 56165, SOAH Docket No. 473-24-12812:  
Application of AEP Texas Inc. for Authority to Change Rates.

Issue: General Rate Case.

Illinois Commerce Commission Docket Nos. 22-0487 and 23-0082 (cons.) (reopen.): Illinois  
Commerce Commission on its Own Motion vs. Ameren Illinois Company d/b/a Ameren Illinois  
and Order Requiring Ameren Illinois Company to file an Initial Multi-Year Integrated Grid Plan  
and Initiating Proceeding to Determine Whether the Plan is Reasonable and Complies with the

**Walmart Inc.**  
**Exhibit LVP-1**

**North Carolina Utilities Commission Docket No. E-100, Sub 190**

Public Utilities Act and Ameren Illinois Company d/b/a Ameren Illinois Petition for Approval of a Multi-Year Rate Plan pursuant to 220 ILCS 5/16-108.18.

Issue: Refiled Multi-Year Integrated Grid Plan.

Public Service Commission of South Carolina Docket No. 2022-326-E: In re: Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of Customer Renewable Programs

Issue: Seeking approval of new voluntary renewable programs.

Iowa Utilities Board Docket No. RPU-2023-0002: In re: Interstate Power and Light Company

Issue: General rate case.

Public Service Commission of South Carolina Docket No. 2023-388-E: In re: Application of Duke Energy Carolinas, LLC for Increase in Electric Rates, Adjustments in Electric Rate Schedules and Tariffs, and Request for an Accounting Order

Issue: General rate case.

Florida Public Service Commission Docket No. 20230017-EI: In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Ian and Nicole, by Florida Power & Light Company.

Issue: Seeking approval of cost recovery for storm costs resulting from Hurricanes Ian and Nicole.

Florida Public Service Commission Docket No. 20230020-EI: In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Elsa, Eta, Isaias, Ian, Nicole, and Tropical Storm Fred, by Duke Energy Florida, LLC.

Issue: Seeking approval of cost recovery for storm costs resulting from the named Hurricanes and Tropical Storm.

Public Utility Commission of Texas Docket No. 55176, SOAH Docket No. 473-24-06013: Application of El Paso Electric Company to Implement a Voluntary Texas Business Solar Power Program.

Issue: Approval of a voluntary renewable energy program.

Florida Public Service Commission Docket No. 20230019-EI: In re: Petition for recovery of costs associated with named tropical systems during the 2019-2022 hurricane seasons and replenishment of storm reserve, by Tampa Electric Company.

Issue: Seeking approval of cost recovery for storm costs incurred during the 2019-2022 hurricane seasons.

Georgia Public Service Commission Docket No. 55378: In Re: Georgia Power Company's 2023 Integrated Resource Plan Update, Certification of the Power Purchase Agreement Between Georgia Power Company and Mississippi Power Company and Santa Rosa Energy Center LLC, and Amended Certification of the Residential Thermostat Demand Response Demand Side Management Program.

Issue: Approval of an updated Integrated Resource Plan.

Public Service Commission of South Carolina Docket No. 2023-369-E: In re: S.C. Code Ann. Section 58-37-60 Independent Study to Evaluate the Integration of Renewable Energy and Emerging Energy Technologies into the Electric Grid for the Public Interest.

Issue: Evaluation of integrating renewable generation and related technologies into the grid.

**2023**

Public Service Commission for the State of Maryland Case No. 9702: In the Matter of the Application of Potomac Electric Power Company for Adjustments to its Retail Rates for the Distribution of Electric Energy

Issue: General rate case.

Public Service Commission for the State of New York Case No. 23-E-0418: Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Central Hudson Gas & Electric Corporation for Electric Service; and Case No. 23-G-0419: Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Central Hudson Gas and Electric Corporation for Gas Service.

Issue: General rate cast for electric and gas service.

Indiana Utility Regulatory Commission Cause No. 45933: Petition of Indiana Michigan Power Company, an Indiana Corporation, for Authority to Increase its Rates and Charges for Electric Utility Service Through a Phase In Rate Adjustment; and for Approval of Related Relief Including: (1) Revised Depreciation Rates, Including Cost of Removal Less Salvage, and Updated Depreciation Expense; (2) Accounting Relief, Including Deferrals and Amortizations; (3) Inclusion of Capital Investment; (4) Rate Adjustment Mechanism Proposals, Including New Grant Projects Rider and Modified Tax Rider; (5) a Voluntary Residential Customer Powerpay Program; (6) Waiver of Declination of Jurisdiction with Respect to Certain Rules to Facilitate Implementation of the Powerpay Program; (7) Cost Recovery for Cook Plant Subsequent License Renewal Evaluation Project; and (8) New Schedules of Rates, Rules and Regulations.

Issue: General rate case.

Public Utilities Commission of Ohio Case No. 23-301-EL-SSO: In the Matter of the Application of Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan.

Issue: Approval of the Company's proposed Electric Security Plan.

Louisiana Public Service Commission Docket No. U-36697: Application of Entergy Louisiana, LLC for Approval of an alternative market-based mechanism process seeking to secure up to 3,000 MW of solar resources, including certification of those resources, expansion of the Geaux Green Option Rider, and approval of a new renewable tariff.

Issue: Approval of a voluntary renewable program backed by utility-owned solar assets.



North Carolina Utilities Commission Docket No. E-100, Sub 190

Commonwealth of Virginia State Corporation Commission Case No. PUR-2023-00101: Application of Virginia Electric and Power Company for a 2023 biennial review of the rates, terms and conditions for the provision of generation, distribution and transmission services pursuant to § 56-585.1 A of the Code of Virginia.

Issue: Biennial review of rates.

Commonwealth of Kentucky Public Service Commission Case No. 2023-00159: Electronic Application of Kentucky Power Company for (1) a General Adjustment of its Rates for Electric Service; (2) Approval of Tariffs and Riders; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; (4) a Securitization Financing Order; and (5) all other Required Approvals and Relief.

Issue: General rate case.

Louisiana Public Service Commission Docket No. U-36625: Application of Entergy Louisiana, LLC for Approval of the Entergy Future Ready Resilience Plan (Phase I)

Issue: Recovery of costs to upgrade transmission and distribution systems.

Colorado Public Utilities Commission Proceeding No. 23A-0242E: In the Matter of the Application of Public Service Company of Colorado for Approval of its 2024-2026 Transportation Electrification Plan.

Issue: Seeking approval of utility's second transportation electrification plan.

Indiana Utility Regulatory Commission Cause No. 45919: In the Matter of the Petition of Indiana Michigan Power Company for Approval of (1) an Electric Vehicle Fast Charging Rate and Tariff and (2) Deferred Accounting Treatment for the Costs of Certain Company-Owned Electric Vehicle Fast Charging Stations and the Revenue from the Electric Vehicle Fast Charging Tariff.

Issue: Approval of an EV charging tariff for utility-owned public EV chargers.

Oklahoma Corporation Commission Cause No. PUD 2023000038: In the Matter of the Application of Oklahoma Gas and Electric Company for Commission Preapproval of New Generation Capacity Pursuant to 17 O.S. Section 286(C).

Issue: Approval to construct two CT units and recovery of costs through a rider.

State Corporation Commission of the State of Kansas Docket No. 23-EKCE-775-RTS: In the Matter of the Joint Application of Evergy Kansas Central, In., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Approval to Make Certain Changes in their Charges for Electric Service.

Issue: General rate case.

Michigan Public Service Commission Case No. U-21389: In the matter of the application of CONSUMERS ENERGY COMPANY for authority to increase its rates for the generation and distribution of electricity and for other relief.

Issue: General rate case.

**Walmart Inc.**  
**Exhibit LVP-1**

**North Carolina Utilities Commission Docket No. E-100, Sub 190**

Public Service Commission of Wyoming Docket No. 20000-633-ER-23 (Record No. 17252): In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Service Rates by Approximately \$140.2 Million Per Year or 21.6 Percent and to Revise the Energy Cost Adjustment Mechanism.

Issue: General Rate Case.

Public Utility Commission of Texas Docket No. 54634, SOAH Docket No. 473-23-14020: Application of Southwestern Public Service Company for Authority to Change Rates.

Issue: General Rate Case.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2023-00002: Application of Appalachian Power Company for a 2023 triennial review of its base rates, terms and conditions pursuant to § 56-585.1 of the Code of Virginia.

Issue: Triennial review of rates.

Michigan Public Service Commission Case No. U-21297: In the matter of the Application of DTE ELECTRIC COMPANY for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority.

Issue: General rate case.

Indiana Utility Regulatory Commission Cause No. 45816: Investigation of the Indiana Utility Regulatory Commission Regarding the Public Utility Regulatory Policies Act Section 111(d) Standards as Amended by the Infrastructure Investment and Jobs Act.

Issue: Electric vehicle charging programs and tariffs.

Illinois Commerce Commission Docket No. 23-0055: Commonwealth Edison Company Petition for Approval of a Multi-Year Rate Plan under Section 16-108.18 of the Public Utilities Act.

Issue: Multi-Year Rate Plan rate case.

Illinois Commerce Commission Docket No. 23-0082: Ameren Illinois Company d/b/a Ameren Illinois Petition for Approval of a Multi-Year Rate Plan pursuant to 220 ILCS 5/16-108.18.

Issue: Multi-Year Rate Plan rate case.

Illinois Commerce Commission Docket No. 23-0067: Ameren Illinois Company d/b/a Ameren Illinois Proposed General Increase in Rates and Revisions to Other Terms and Conditions of Service. (Tariff filed January 6, 2023).

Issue: Gas general rate case.

Illinois Commerce Commission Docket No. 23-0066: Northern Illinois Gas Company d/b/a Nicor Gas Company Proposed General Increase in Rates and Revisions to Other Terms and Conditions of Service. (Tariff filed January 3, 2023).

Issue: Gas general rate case.

Indiana Utility Regulatory Commission Cause No. 45843: Verified Petition of Indianapolis Power & Light Company d/b/a AES Indiana for Commission Approval of an Electric Vehicle Portfolio, Including: (1) A Public Use Electric Vehicle Pilot Program Pursuant to Ind. Code Ch. 8-1-43; and (2) Time-Varying and Other Alternative Pricing Structures and Tariffs Pursuant to Ind. Code §8-1-2.5-6(3); and for Approval of Associated Accounting and Ratemaking.

Issue: Electric vehicle charging programs and tariffs.

Arkansas Public Service Commission Docket No. 22-065-U: In the Matter of the Application of Southwestern Electric Power Company for a Certificate of Public Convenience and Necessity to Operate the John W. Turk, Jr. Power Plant to Supply a Public Service to its Arkansas Customers and for Approval of a Generation Cost Recovery Rider to Recover its Costs in Arkansas Rates.

Issue: Cost recovery from customers of an existing generation resource.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2022-00166: Petition of Appalachian Power Company for consideration of the appropriate framework for cost recovery, the allocation of costs net of benefits pursuant to Code § 56-585.5 F, and class and jurisdictional cost allocation.

Issue: Recovery methodology and cost allocation of VCEA-related costs.

Oklahoma Corporation Commission Cause No. PUD 202200093: Application of Public Service Company of Oklahoma, an Oklahoma Corporation, for an Adjustment in its Rates and Charges and the Electric Service Rules, Regulations and Conditions of Service for Electric Service in the State of Oklahoma and to Approve a Formula Base Rate Proposal.

Issue: General rate case.

Oklahoma Corporation Commission Cause No. PUD 202200121: Application of Public Service Company of Oklahoma (PSO) for Approval of the Cost Recovery of the Selected Wind and Solar Facilities (Renewable Resources); a Determination there is a Need for the Renewable Resources; Approval for Cost Recovery of Prudent Costs Incurred by PSO for the Renewable Resources; Approval of a Temporary Cost Recovery Rider; Approval of Certain Treatment of Federal Production Tax Credits; and Such Other Relief the Commission Deems PSO is Entitled.

Issue: Acquisition of renewable generation and recovery through a rider.

Arkansas Public Service Commission Docket No. 22-061-U: In the Matter of an Application into Potential Cost Shifting Associated with Net Metering.

Issue: Net metering tariff and any potential cost shifting between participating and non-participating customers.

## **2022**

Commonwealth of Virginia State Corporation Commission Case No. PUR-2022-00124: Petition of Virginia Electric and Power Company for approval of its 2022 RPS Development Plan under § 56-585.5 D 4 of the Code of Virginia and related requests.

Issue: Approval of 2022 RPS Plan, new renewable projects, PPAs, and cost recovery mechanism, Rider CE, pursuant to the VCEA.

**Walmart Inc.**  
**Exhibit LVP-1**

**North Carolina Utilities Commission Docket No. E-100, Sub 190**

Public Service Commission of South Carolina Docket No. 2022-254-E: In re: Application of Duke Energy Progress, LLC for Increase in Electric Rates, Adjustments in Electric Rate Schedules and Tariffs, and Request for an Accounting Order.

Issue: General rate case.

Public Utility Commission of Texas Docket No. 53719, SOAH Docket No. 473-22-04394: Application of Entergy Texas, Inc. for Authority to Change Rates.

Issue: General rate case.

Louisiana Public Service Commission Docket No. U-36350: Application of Entergy Louisiana, LLC for Recovery in Rates of Costs Related to Hurricane Ida and Related Relief

Issue: Recovery costs related to Hurricane Ida.

Illinois Commerce Commission Docket Nos. 22-0432 and 22-0442 (cons.): Commonwealth Edison Company Petition for Approval of Beneficial Electrification Plan under the Electric Vehicle Act, 20 ILCS 627/45 and New EV Charging Delivery Classes under the Public Utilities Act, Article IX and Illinois Commerce Commission on its own Motion vs. Commonwealth Edison Company Investigation into Commonwealth Edison Company's Beneficial Electrification Plan Filing pursuant to 20 ILCS 627/45

Issue: Approval of Beneficial Electrification Plan.

Illinois Commerce Commission Docket Nos. 22-0431 and 22-0443 (cons.): Ameren Illinois Company d/b/a Ameren Illinois Petition for Approval of Beneficial Electrification Plan pursuant to Section 45 of the Electric Vehicle Act and Illinois Commerce Commission on its own Motion vs. Ameren Illinois Company d/b/a Ameren Illinois Investigation into Ameren Illinois Company's Beneficial Electrification Plan Filing pursuant to 20 ILCS 627/45

Issue: Approval of Beneficial Electrification Plan.

Florida Public Service Commission Docket No. 20220010-EI: In re: Storm protection plan cost recovery clause

Issue: Seeking approval of the cost allocation and recovery methodologies used for storm protection plan cost recovery clause.

Michigan Public Service Commission Case No. U-21224: In the matter of the application of CONSUMERS ENERGY COMPANY for authority to increase its rates for the generation and distribution of electricity and for other relief.

Issue: General rate case.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2021-00156: *Ex Parte*: Establishing a proceeding concerning the allocation of RPS-related costs and the determination of certain proxy values for Virginia Electric and Power Company.

Issue: Allocation methodology for VCEA-related costs and benefits.

Michigan Public Service Commission Case No. U-20836: In the matter of the Application of DTE Electric Company for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority.

Issue: General rate case.

Oklahoma Corporation Commission Cause No. PUD 202100164: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Authorizing Applicant to Modify its Rates, Charges, and Tariffs for Retail Electric Service in Oklahoma.

Issue: General Rate Case.

Louisiana Public Service Commission Docket No. U-36190: Application of Entergy Louisiana, LLC for Certification and Approval of the 2021 Solar Portfolio, Rider Geaux Green Option, Cost Recovery and Related Relief.

Issue: Approval of a voluntary renewable program backed by utility-owned solar assets.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2021-00135: Petition of Appalachian Power Company For approval of its 2021 RPS Plan under § 56-585.5 of the Code of Virginia and related requests.

Issue: Seeking approval of RPS Plan and recovery mechanisms for related costs.

Commonwealth of Kentucky Public Service Commission Case No. 2021-00481: Electronic Joint Application of American Electric Power Company, Inc., Kentucky Power Company and Liberty Utilities Co. for Approval of the Transfer of Ownership and Control of Kentucky Power Company.

Issue: Acquisition of Kentucky Power Company by Liberty Utilities Company.

Public Utility Commission of Texas Docket No. 52451, SOAH Docket No. 473-22-0816: Application of Southwestern Public Service Company for Approval of Advanced Metering System (AMS) Deployment Plan, AMS Surcharge, and Non-Standard Metering Service Fee.

Issue: Approval to implement AMS and recover costs through an additional surcharge.

Arkansas Public Service Commission Docket No. 21-070-U: In the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Issue: General rate case.

Arkansas Public Service Commission Docket No. 21-087-U: In the Matter of Oklahoma Gas and Electric Company's Request to Extend its Formula Rate Plan Rider.

Issue: Seeking extension of formula rate plan.

### **2021**

Louisiana Public Service Commission Docket No. U-36105: Application for Certification to Deploy Natural Gas-Fired Distributed Generation and Authorization to Implement Rider UODG.

Issue: Approval to implement a distributed generation program and rider recovery.

**Walmart Inc.**  
**Exhibit LVP-1**

**North Carolina Utilities Commission Docket No. E-100, Sub 190**

Public Utility Commission of Texas Docket No. 52389, SOAH Docket No. 473-22-0009: Application of Southwestern Electric Power Company for Advanced Metering System (AMS) Deployment Plan, AMS Surcharge, and Non-Standard Metering Service Fees.  
Issue: Approval to implement AMS and recover costs through an additional surcharge.

Louisiana Public Service Commission Docket No. U-35991: Application of Entergy Louisiana, LLC for Recovery in Rates of Costs Related to Hurricanes Laura, Delta, Zeta and Winter Storm Uri and for Related Relief.  
Issue: Securitization of system restoration costs due to extreme weather conditions.

Oklahoma Corporation Commission Cause No. PUD 202100076: Application of Public Service Company of Oklahoma (“PSO”) for Approval of a Financing Order for the Collection of Increased Costs Caused by the Extreme Winter Weather and Contained in the Regulatory Asset Authorized by Order 717625, Including an Appropriate Carrying Cost, and Such Other Relief as the Commission Deems PSO is Entitled.  
Issue: Securitization of excessive fuel costs due to extreme weather conditions.

Colorado Public Utilities Commission Proceeding No. 21A-0141E: In the Matter of the Application of Public Service Company of Colorado for Approval of its 2021 Electric Resource Plan and Clean Energy Plan.  
Issue: Seeking approval of utility’s plan to meet legislative renewable and carbon reduction goals.

Arkansas Public Service Commission Docket No. 21-054-TF: In the Matter of the Application of Entergy Arkansas, LLC for a Proposed Tariff Revision Regarding a Green Promise Tariff.  
Issue: Seeking approval for a voluntary renewable energy tariff.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2021-00058: Application of Virginia Electric and Power Company for a 2021 triennial review of the rates, terms and conditions for the provision of generation, distribution and transmission services pursuant to § 56-585.1 A of the Code of Virginia.  
Issue: General Rate Case.

Public Utility Commission of Texas Docket No. 52040, SOAH Docket No. 473-21-2607: Application of El Paso Electric Company for Advanced Metering System (AMS) Deployment Plan, AMS Surcharge, and Non-Standard Metering Service Fees.  
Issue: Approval to implement AMS and recover costs through an additional surcharge.

Oklahoma Corporation Commission Cause No. PUD 202100072: In the Matter of the Application of Oklahoma Gas and Electric Company for a Financing Order Pursuant to the February 2021 Regulated Utility Consumer Protection Act Approving Securitization of Costs Arising from the Winter Weather Event of February 2021.  
Issue: Securitization of excessive fuel costs due to extreme weather conditions.

Public Utility Commission of Texas Docket No. 51802, SOAH Docket No. 473-21-1892: Application of Southwestern Public Service Company for Authority to Change Rates.

Issue: General rate case.

Oklahoma Corporation Commission Cause No. PUD 202100055: Application of Public Service Company of Oklahoma, an Oklahoma Corporation, for an Adjustment in its Rates and Charges and the Electric Service Rules, Regulations and Conditions of Service for Electric Service in the State of Oklahoma.

Issue: General rate case.

Louisiana Public Service Commission Docket No. U-35441: Application of Southwestern Power Company (SWEPCO) for Approval of a Change in Rates, Extension of Formula Rate Plan and Other Related Relief.

Issue: General rate case and extension of formula rate plan.

Michigan Public Service Commission Case No. U-20963: In the matter of the application of Consumers Energy Company for authority to increase its rates for the generation and distribution of electricity and for other relief.

Issue: General rate case.

Florida Public Service Commission Docket No. 20210010-EI: In re: Storm protection plan cost recovery clause

Issue: Seeking approval of the cost allocation and recovery methodologies used for storm protection plan cost recovery clause.

Arkansas Public Service Commission Docket No. 19-008-U: In the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs.

Issue: Seeking approval for amortization period and carrying costs for extraordinary fuel costs related to Winter Storm Uri.

Public Utility Regulatory Authority of Connecticut Docket No. 17-12-03RE11: PURA Investigation into Distribution System Planning of the Electric Distribution Companies – New Rate Designs and Rates Review.

Issue: Investigation into low-income rates and economic development rates.

Public Utility Commission of Texas Docket No. 51415, SOAH Docket No. 473-21-0538: Application of Southwestern Electric Power Company for Authority to Change Rates.

Issue: General rate case.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2020-00170: Petition of Virginia Electric and Power Company for approval of a rate adjustment clause, designated Rider RPS, under § 56-585.1 A 5 d of the Code of Virginia.

Issue: Seeking approval of a Rider RPS to recover costs associated with REC purchases made to comply with the Virginia Clean Economy Act.

Commonwealth of Kentucky Public Service Commission Case No. 2020-00350: Electronic Application of Louisville Gas and Electric Company for an Adjustment of its Electric and Gas Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit.

Issue: General rate case.

Commonwealth of Kentucky Public Service Commission Case No. 2020-00349: Electronic Application of Kentucky Utilities Company for an Adjustment of its Electric Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit.

Issue: General rate case.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2020-00164: *Ex Parte*: Allocating RPS costs to certain customers of Virginia Electric and Power Company.

Issue: Determining which costs and benefits of Virginia Clean Economy Act-related assets should be allocated to non-utility customers and seeking approval of a Rider NBC to recover/credit some of those costs and/or benefits.

Oklahoma Corporation Commission Cause No. PUD 202000097: Application of Public Service Company of Oklahoma (“PSO”) for Approval of the Cost Recovery of Facilities to be Located at Ft. Sill; a Determination there is a Need for the Facilities; Approval for Future Inclusion in Base Rates for Cost Recovery of Prudent Costs Incurred by PSO for the Facilities; Approval of a Temporary Cost Recovery Rider; and Such Other Relief the Commission Deems PSO is Entitled.

Issue: Seeking approval to acquire a solar facility and gas facility sited at Fort Sill.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2020-00134: *Ex Parte*: Establishing 2020 RPS Proceeding for Virginia Electric and Power Company.

Issue: Seeking approval of a Renewable Portfolio Standard Plan and rider pursuant to the Virginia Clean Economy Act (VCEA).

## **2020**

Commonwealth of Virginia State Corporation Commission Case No. PUR-2020-00135: *Ex Parte*: Establishing 2020 RPS Proceeding for Appalachian Power Company.

Issue: Seeking approval of a Renewable Portfolio Standard Plan pursuant to the Virginia Clean Economy Act (VCEA).

Public Service Commission of South Carolina Docket No. 2019-209-E: In re: South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to Dominion Energy South Carolina, Incorporated and S.C. Code Ann. Section 58-41-30 Related to Electrical Utilities and Their Current Voluntary Renewable Energy Program, and Such Other Proceedings Required By the Commission.

Issue: Seeking approval of a Voluntary Renewable Energy Rider.



**Walmart Inc.**  
**Exhibit LVP-1**

**North Carolina Utilities Commission Docket No. E-100, Sub 190**

Public Service Commission of South Carolina Docket No. 2020-125-E: In re: Application of Dominion Energy South Carolina, Incorporated for Adjustment of Rates and Charges.  
Issue: General rate case.

Arkansas Public Service Commission Docket No. 16-036-FR: In the Matter of Formula Rate Plan Filings of Entergy Arkansas, Inc., Pursuant to APSC Docket No. 15-015-U.  
Issue: Seeking five-year extension of Formula Rate Plan.

Colorado Public Utilities Commission Proceeding No. 20A-0204E: In the Matter of the Application of Public Service Company of Colorado for Approval of its 2021-2023 Transportation Electrification Plan.  
Issue: Seeking approval of utility's plan to encourage EV adoption in its service territory.

Commonwealth of Kentucky Public Service Commission Case No. 2020-00174: Electronic Application of Kentucky Power Company for (1) a General Adjustment of its Rates for Electric Service; (2) Approval of Tariffs and Riders; (3) Approval of Accounting Practices to Establish Regulatory Assets and Liabilities; (4) Approval of a Certificate of Public Convenience and Necessity; and (5) All Other Required Approvals and Relief.  
Issue: General rate case.

Oklahoma Corporation Commission Cause No. PUD 202000021: In the Matter of the Application of Oklahoma Gas and Electric Company for an Order of the Commission Approving a Recovery Mechanism for Expenditures Related to the Oklahoma Grid Enhancement Plan.  
Issue: Seeking approval of a rider that allows for interim recovery of costs associated with expenditures made to enhance the grid.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2020-00015: Application of Appalachian Power Company For a 2020 Triennial Review of the Rates, Terms and Conditions for the Provision of Generation, Distribution and Transmission Services Pursuant to § 56-585.1 A of the Code of Virginia.  
Issue: General Rate Case.

Michigan Public Service Commission Case No. U-20697: In the matter of the application of Consumers Energy Company for authority to increase its rates for the generation and distribution of electricity and for other relief.  
Issue: General rate case.

Florida Public Service Commission Consolidated Docket Nos. 20200067-EI, 20200069-EI, 20200070-EI, 20200071-EI: In re: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company *et al.*  
Issue: Seeking approval of Storm Protection Plans submitted by Tampa Electric Company, Duke Energy Florida, LLC, Gulf Power Company, and Florida Power & Light Company.

Arkansas Public Service Commission Docket No. 20-027-U: In the Matter of the Application of Walmart Inc. for Approval to Bid Demand Response into Wholesale Electricity Markets Through an Aggregator of Retail Customers.

Issue: Seeking approval to bid demand response into MISO through a third-party aggregator.

Public Utility Commission of Texas Docket No. 49737, SOAH Docket No. 473-19-6862: Application of Southwestern Electric Power Company for Certificate of Convenience and Necessity Authorization and Related Relief for the Acquisition of Wind Generation Facilities.

Issue: Seeking approval to acquire a wind generation facility located in Oklahoma.

Louisiana Public Service Commission Docket No. U-35324: Application of Southwestern Power Company (SWEPCO) for Certification and Approval of the Acquisition of Certain Renewable Resources in Accordance with the MBM Order and the 1983 and 1994 General Orders.

Issue: Seeking approval to acquire a wind generation facility located in Oklahoma.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2019-00201: Application of Virginia Electric and Power Company for approval of its 2019 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia.

Issue: Seek approval to implement eleven new demand-side management programs, to extend existing programs - some with updated parameters and cost/benefit results, and to continue three rate adjustment clauses.

### **2019**

Oklahoma Corporation Commission Cause No. PUD 201900048: Application of Public Service Company of Oklahoma for Approval of the Cost Recovery of the Selected Wind Facilities; A Determination there is a Need for the SWFs; Approval for Future Inclusion in Base Rates Cost Recovery of Prudent Costs Incurred by PSO for the SWFs; Approval of a Temporary Cost Recovery Rider; Approval of Certain Accounting Procedures Regarding Federal Production Tax Credits; and Such Other Relief the Commission Deems PSO in Entitled.

Issue: Seeking approval to acquire a wind generation facility located in Oklahoma and Wind Facility Asset Rider.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2019-00094: Application of Virginia Electric and Power Company for Approval of a 100 Percent Renewable Energy Tariff, Designated Rider TRG, Pursuant to §§ 56-577 A 5 and 56-234 of the Code of Virginia.

Issue: Seek approval of a 100 percent renewable energy tariff.

Public Service Commission of South Carolina Docket No. 2019-239-E: In re: Dominion Energy South Carolina, Incorporated's Request for Approval of an Expanded Portfolio of Demand Side Management Programs, and a Modified Demand Side Management Rate Rider.

Issue: Seeking approval of an expanded Demand Side Management Plan and modified Demand Side Management Rate Rider.

Arkansas Public Service Commission Docket No. 19-035-U: In the Matter of the Application of Southwestern Electric Power Company for Approval to Acquire Wind Generating Facilities Pursuant to the Arkansas Clean Energy Development Act.

Issue: Seeking approval to acquire a wind generation facility located in Oklahoma and Wind Facility Asset Rider.

Commonwealth of Virginia State Corporation Commission Case No. PUR-2019-00154: Petition of Virginia Electric and Power Company for approval of a plan for electric distribution grid transformation projects pursuant to § 56-585.1 A 6 of the Code of Virginia, and for approval of an addition to the terms and condition applicable to electric service.

Issue: Seeking approval of certain expenditures relating to grid improvement and grid hardening.

### **COMMISSION DOCKETS (Appearing as Attorney of Record)**

#### **2019**

Public Utility Commission of Texas Docket No. 49421: Application of CenterPoint Energy Houston Electric, LLC for Authority to Change Rates.

Issue: General rate case

Public Utility Commission of Texas Docket No. 49494: Application of AEP Texas Inc. for Authority to Change Rates.

Issue: General rate case

Public Utility Commission of Colorado Docket No. 19AL-0268E: In the Matter of Advice Letter No. 1797 Filed by Public Service Company of Colorado to Reset the Currently Effective General Rate Schedule Adjustment (“GRSA”) as Applied to Base Rates for all Electric Rate Schedules as well as Implement a Base Rate kWh Charge, General Rate Schedule Adjustment-Energy (“GRSA-E”) to Become Effective June 20, 2019.

Issue: General rate case, Phase I

#### **2018**

Public Utility Commission of Texas Docket No. 48371: Entergy Texas, Inc.’s Statement of Intent and Application for Authority to Change Rates.

Issue: General rate case

Public Utility Commission of Colorado Docket No. 18M-0074EG: In the Matter of the Commission’s Consideration of the Impact of the Federal Tax Cuts and Jobs Act of 2017 on the Rates of Colorado Investor-Owned Electric and Natural Gas Utilities.

Issue: Commenced by the Commission to consider the impacts of the Tax Cut and Jobs Act of 2017 on the revenue requirements and rates of all Colorado investor-owned electric and natural gas utilities.

**2017**

Public Utility Commission of Texas Docket No. 47461: Application of Southwestern Electric Power Company for Certificate of Convenience and Necessity Authorization and Related Relief for the Wind Catcher Energy Connection Project in Oklahoma.

Issue: Purchase of a wind generation facility and generation tie line.

Public Utility Commission of Texas Docket No. 47527: Application of Southwestern Public Service Company for Authority to Change Rates.

Issue: General rate case

Public Utility Commission of Colorado Docket No. 17A-0462EG: In the Matter of the Application of Public Service Company of Colorado for Approval of a Number of Strategic Issues Relating to its Electric and Gas Demand-Side Management Plan.

Issue: Seek Commission re-examination and approval of the overall objectives and structure of Public Service's DSM initiatives to guide the Company in designing future DSM plans.

Public Utility Commission of Colorado Docket No. 17AL-0649E: In the Matter of Advice Letter No. 1748-Electric Filed by Public Service Company of Colorado to Revise its PUC No. 8-Electric Tariff to Implement a General Rate Schedule Adjustment and Other Rate Changes Effective on Thirty Days' Notice.

Issue: General rate case, Phase I

Arkansas Public Service Commission Docket No. 17-038-U: In the Matter of the Application of Southwestern Electric Power Company for Approval to Acquire a Wind Generating Facility and to Construct a Dedicated Generation Tie Line.

Issue: Purchase of a wind generation facility and generation tie line.

Louisiana Public Service Commission Docket No. U-34619: Application for Expedited Certification and Approval of the Acquisition of Certain Renewable Resources and the Construction of a Generation Tie Pursuant to the 1983 and/or 1994 General Orders.

Issue: Purchase of a wind generation facility and generation tie line.

**2016**

Public Utility Commission of Colorado Docket No. 16AL-0048E: In the Matter of Advice Letter No. 1712-Electric Filed by Public Service Company of Colorado to Replace Colorado PUC No. 7-Electric Tariff with Colorado PUC No. 8-Electric Tariff.

Issue: General rate case, Phase II

Public Utility Commission of Colorado Docket No. 16A-0055E: In the Matter of the Application of Public Service Company of Colorado for Approval of its Solar\*Connect Program.

Issue: Implement a voluntary solar program offering participating customers the ability to offset their current supply of energy from the Public Service system with solar energy produced at a dedicated facility or facilities.

New Mexico Public Regulation Commission Docket No. 16-00276-UT: In the Matter of the Application of Public Service Company of New Mexico for Revision of its Retail Electric Rates Pursuant to Advice Notice No. 533.

Issue: General rate case

**INDUSTRY TRAINING**

- 2020 Practical Regulatory Training for the Electric Industry, Center for Public Utilities, New Mexico State University College of Business
- 2020 IPU Accounting and Ratemaking Course, Michigan State University
- 2016 and 2022 Western NARUC Utility Rate School
- EUCI Courses on the utility industry, cost allocation, and rate design.

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-100, SUB 190

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of: )  
)  
Biennial Consolidated Carbon Plan and )  
Integrated Resource Plans of Duke Energy )  
Carolinas, LLC, and Duke Energy Progress, )  
LLC, Pursuant to N.C.G.S. § 62-110.9 and )  
§ 62-110.1(c) )

**EXHIBIT LVP-2 OF**

**LISA V. PERRY**

**ON BEHALF OF**

**WALMART, INC.**

Public Staff  
Docket No. E-100, Sub 190  
2023 Carolinas Resource Plan  
Public Staff Request No. 21  
Item No. 21-9  
Page 1 of 1

**DUKE ENERGY CAROLINAS, LLC & DUKE ENERGY PROGRESS, LLC**

**Request:**

Please describe what customer programs the Company is considering accelerating, as described on page 11.

**Response:**

The Company is still in the initial phases of evaluating different potential new customer programs including, but not limited to rate offerings and load management programs that incentivize customers to lower demand during times of utility system need, but does not have any formal analysis complete at this time.

Responder: Stacy Phillips, Director, Demand Side Management

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-100, SUB 190

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of: )  
)  
Biennial Consolidated Carbon Plan and )  
Integrated Resource Plans of Duke Energy )  
Carolinas, LLC, and Duke Energy Progress, )  
LLC, Pursuant to N.C.G.S. § 62-110.9 and )  
§ 62-110.1(c) )

**EXHIBIT LVP-3 OF**

**LISA V. PERRY**

**ON BEHALF OF**

**WALMART, INC.**



CIGFUR  
Docket No. E-100, Sub 190  
2023 Carolinas Resource Plan  
CIGFUR Request No. 3  
Item No. 3-2  
Page 1 of 1

**DUKE ENERGY CAROLINAS, LLC & DUKE ENERGY PROGRESS, LLC**

**Request:**

If confirmed, then please confirm or deny that the \$/month bill impact graph in Figure SPA 1-3 is an extrapolation of the CAGR as shown in the same Figure.

- a. If confirmed, please then confirm or deny that this same extrapolation of the CAGR can be performed on each customer class to provide a comparable estimate of the projected bill impacts for other customer classes.
- b. If denied, please then provide bill impacts for each customer class that is comparable to the \$/month bill impacts for the residential class as presented in Figure SPA 1-3.

**Response:**

3-2: Confirmed.

3-2(a): Confirmed.

3-2(b): See the Companies' response to 3-2(a).

Responder: Amber D. Williams, Rates & Regulatory Strategy Manager

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-100, SUB 190

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of: )  
)  
Biennial Consolidated Carbon Plan and )  
Integrated Resource Plans of Duke Energy )  
Carolinas, LLC, and Duke Energy Progress, )  
LLC, Pursuant to N.C.G.S. § 62-110.9 and )  
§ 62-110.1(c) )

**APPENDIX A OF**  
**LISA V. PERRY**  
**ON BEHALF OF**  
**WALMART, INC.**

**APPENDIX A – INDEX AND IDENTIFICATION OF ISSUES**

In compliance with Ordering Paragraph 1 of the North Carolina Utility Commission's ("Commission") February 21, 2024, Order Establishing Additional Procedures for Witness Hearing ("Order"), Walmart Inc. ("Walmart") provides the following detailed table identifying the designated issues and topics addressed in the Direct Testimony of Lisa V. Perry.

Designated Issue(s)	Page/Section of Perry Direct Testimony	Responding to Section(s) of Companies' CPIRP Filing	
		CPIRP Filing Page/Sections	Companies' Direct Testimony
<p><b>ENERGY TRANSITION PATHWAYS – DEMAND-SIDE SOLUTIONS</b></p> <p>The Companies need to act more expeditiously to "shrink the challenge."</p>	<p>II. Purpose and Summary of Recommendations, p. 6</p> <p>IV. Energy Transition Pathways – Demand-Side Solutions, pp. 11-12</p> <p>V. Walmart's Sustainability Goals, pp. 12-15</p> <p>VI. Customer Program, pp. 15-20</p>	<p>– Executive Summary, Reducing Demand and Optimizing Load Through Grid Edge and Customer Programs Solutions, pp. 8-9</p> <p>– Appendix H – Grid End and Customer Programs</p>	<p>– Direct Testimony of Timothy J. Duff and Jonathan L. Byrd</p> <ul style="list-style-type: none"> <li>○ p. 6, lines 1-18</li> <li>○ p. 9, line 4 to p. 15, line 12</li> <li>○ p. 19, line 3 to p. 26, line 5</li> <li>○ p. 27, line 11 to p. 31, line 14</li> <li>○ p. 37, line 11 to p. 41, line 4</li> <li>○ Exhibit 1</li> </ul>
<p><b>CUSTOMER-SITED GENERATION</b></p> <p>The Companies should propose a program for at least 600 MW of customer-cited generation, open to new and existing customers.</p>	<p>II. Purpose and Summary of Recommendations, p. 7</p> <p>VII. Customer-Sited Generation Solutions, pp. 20-23</p>	<p>N/A</p>	<p>– Supplemental Direct Testimony of Glen A. Snider, p. 10, lines 6-14.</p>

<p><b>RESERVE MARGIN AND RESOURCE ADEQUACY STUDY</b></p> <p>The Commission should carefully scrutinize the Companies' request to increase its reserve margin to 22 percent.</p>	<p>II. Purpose and Summary of Recommendations, p. 7</p> <p>VIII. Reserve Margin and Resource Adequacy Study, pp. 23-25</p>	<ul style="list-style-type: none"> <li>- Executive Summary, p. 6</li> <li>- CPIRP Attachment I - 2023 Resource Adequacy Study (entire document)</li> </ul>	<ul style="list-style-type: none"> <li>- Direct Testimony of Richard Nicholas Wintermantel and Cole Michael Benson</li> </ul>
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