

BEFORE THE CORPORATION COMMISSION OF OKLAHOMA

**IN THE MATTER OF THE APPLICATION OF)
OKLAHOMA GAS AND ELECTRIC COMPANY)
FOR COMMISSION APPROVAL OF THE)
COMPANY'S PLAN TO INSTALL DRY) CAUSE NO. PUD 201600059
SCRUBBERS AT THE SOONER GENERATING)
FACILITY)**

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CORPORATION COMMISSION
OF OKLAHOMA

**Responsive Testimony of
Tyler Comings**

**On Behalf of
Sierra Club**

March 14, 2016

Q Please state your name, business address, and position.

A My name is Tyler Comings. I am a Senior Associate with Synapse Energy Economics, Inc. (“Synapse”), which is located at 485 Massachusetts Avenue, Suite 2, in Cambridge, Massachusetts.

Q Please summarize your work experience and educational background.

A I have eleven years of experience in economic research and consulting. At Synapse, I have worked extensively in the energy planning sector, including work on integrated resource plans, costs of regulatory compliance and economic impact analyses. I have provided consulting services for various other clients including for the U.S. Department of Justice, District of Columbia Office of the People’s Counsel, District of Columbia Government, Maryland Office of the People’s Counsel, New Jersey Division of Rate Counsel, West Virginia Consumer Advocate Division, Illinois Attorney General, Nevada State Office of Energy, Sierra Club, Earthjustice, Citizens Action Coalition of Indiana, Consumers Union, Energy Future Coalition, American Association of Retired Persons, and Massachusetts Energy Efficiency Advisory Council.

I have provided testimony on electricity planning and economic impacts in the District of Columbia, Hawaii, Indiana, Kentucky, Ohio, Oklahoma, Maryland, and New Jersey.

Prior to joining Synapse, I performed research in consumer finance for Ideas42 and economic analysis of transportation and energy investments at Economic Development Research Group.

I hold a B.A. in Mathematics and Economics from Boston University and an M.A. in Economics from Tufts University.

My full resume is attached as Exhibit TFC-1.

Q Please describe Synapse Energy Economics.

A Synapse Energy Economics is a research and consulting firm specializing in energy and environmental issues, including electric generation, transmission and distribution system reliability, ratemaking and rate design, electric industry restructuring and market power,

electricity market prices, stranded costs, efficiency, renewable energy, environmental quality, and nuclear power.

Synapse's clients include state consumer advocates, public utilities commission staff, attorneys general, environmental organizations, federal government agencies, and utilities.

Q On whose behalf are you testifying in this case?

A I am testifying on behalf of Sierra Club.

Q Have you testified in front of the Oklahoma Corporation Commission previously?

A Yes. I testified in *In re: Application of Oklahoma Gas and Electric Company for Comm. Authorization of Plan to Comply with Federal Clean Air Act and Cost Recovery and for Approval of the Mustang Modernization Plan and Cost Recovery* (Cause No. 2014-00229) (hereafter referred to as the "2014 Application").

Q Are you submitting any substantive responsive testimony at this time?

A No. This Cause comes before the Commission because on February 12, 2016, Oklahoma Gas and Electric Company ("OG&E") filed an application that requests preapproval of its plan to install dry scrubbers at the Sooner power plant. *In re: Application of OG&E for Comm. Approval of Plan to Install Dry Scrubbers at the Sooner Generating Facility* (Feb. 12, 2016) (hereafter referred to as the "2016 Application"), at pg. 3, ¶ G. This application seeks the same relief, in part, that OG&E requested in its 2014 Application, preapproval of its plan to install scrubbers at the Sooner Plant.

On December 2, 2015, the Commission denied OG&E's 2014 Application in its entirety, including OG&E request to preapprove its plan to install scrubbers on the Sooner plant. *See* Order No. 647346.

OGE supported its 2016 Application with testimony from one witness, Donald Rowlett. Witness Rowlett did not offer any substantively new evidence that was not presented to the Commission in Cause No. PUD 201400229 regarding why the Commission should reverse its Order denying preapproval of OG&E's plan to install scrubbers on the Sooner plant.

On March 11, 2016, the Commission issued an order that incorporated the entire record from Cause No. PUD 201400229 into the present cause, specifically all testimony and testimony exhibits, hearing transcripts, trial exhibits, filings and briefs. *See* Order No. 650639.

At this point in time OG&E has not offered any new testimony or evidence that was not considered by the Commission when it denied OG&E's request for preapproval of its Environmental Compliance Plan, including its plan to install scrubbers on the Sooner plant. The record in this case is thus substantively identical to the record in Cause No. 2014-00229. As such, at this point in time, I have no need to submit any substantive responsive testimony because there is no new evidence that would change the analysis or conclusions I reached in my testimony in Cause No. PUD 201400229.

Q Are you reserving the right to submit substantive testimony later?

A Yes. If OG&E or another party puts forth any material new evidence that was not considered by the Commission in Cause No. PUD 201400229, I am reserving the right for me and other witnesses to submit substantive testimony on behalf of Sierra Club.

Q Does this conclude your testimony?

A It does.

CERTIFICATE OF SERVICE

On this 14th day of March 2016, the undersigned caused a true and correct copy of the above and foregoing document to be transmitted to the following:

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/s/ Kristin A. Henry
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