Q. McShane Evidence – Please confirm that utilities with a significant industrial base of customers face higher business risk on that criterion than those less dependent upon industrial customers and please explain why that is the case.

A. On that criterion alone, yes, as industrial customers can expose the utility to greater
counterparty risk and higher earnings volatility. The extent to which that is the case
depends on many factors, including the nature and diversity of the customers, contractual
arrangements, security required from customers and rate design.