

**DIRECT TESTIMONY OF ERIN SCHNEIDER  
DIRECTOR OF ECONOMIC DEVELOPMENT  
DUKE ENERGY INDIANA, LLC  
BEFORE THE  
INDIANA UTILITY REGULATORY COMMISSION**

**I. INTRODUCTION**

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

2 A. My name is Erin Schneider and my business address is 1000 East Main Street,  
3 Plainfield, Indiana 46168.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am employed by Duke Energy Indiana, LLC ("Duke Energy Indiana" or  
6 "Company") as Director of Economic Development.

7 **Q. WHAT ARE YOUR DUTIES AND RESPONSIBILITIES AS DIRECTOR  
8 OF ECONOMIC DEVELOPMENT?**

9 A. My responsibilities include developing and executing strategies that lead to  
10 economic growth within Duke Energy Indiana's service territory. I also lead the  
11 team that interfaces with state, regional, and local economic development  
12 organizations in addition to site selectors and companies considering expanding or  
13 relocating to Indiana.

14 **Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL AND  
15 PROFESSIONAL BACKGROUND.**

16 A. I have over fourteen years of experience in the field of Economic Development. I  
17 have been employed with Duke Energy Indiana in my current position since May  
18 2016. Prior to my current position as Director of Economic Development, I was

**ERIN SCHNEIDER**

- 1 -

IURC  
PETITIONER'S  
EXHIBIT NO. 2-21-22  
DATE 1 REPORTER

**OFFICIAL  
EXHIBITS**

1 employed by the Indiana Economic Development Corporation ("IEDC") since 2007.

2 I most recently served as the Central Region Director of Business Development and

3 Director of Outside Sales. I led a team of three project managers covering mainly

4 the 34 counties across central Indiana. Our efforts from January 2014 to May 2016

5 resulted in business expansion and attraction projects involving more than 25,100

6 projected new jobs and more than \$2.6 billion in committed capital investment. I

7 also established the IEDC's research department and served as the Director of

8 Research from 2011-2013 providing data analyses and strategic content to support

9 business attraction and expansion efforts by state, regional and local economic

10 development organizations. Prior to 2011, I held positions as the IEDC's dedicated

11 Senior Project Manager for East Central Indiana with a special focus on European

12 attraction projects which took me overseas on two business recruitment trips to Italy

13 and England. These domestic and international efforts resulted in more than 1,625

14 projected jobs and over \$175 million in committed capital investment. From 1999-

15 2007, I worked in the motion picture industry in Los Angeles, California as a

16 producer with Kopelson Entertainment and Level 1 Entertainment where I held the

17 position of Vice President of Production. I received a Bachelor of Arts degree in

18 Telecommunications from Ball State University, Muncie, Indiana. Currently, I am

19 enrolled at Western Governors University to obtain my Master of Sciences in

20 Management and Leadership Degree.

21 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
22 **PROCEEDING?**

1 A. My testimony will summarize the River Ridge Commerce Center Project and  
2 costs that the Company seeks approval to include as part of TDSIC 2.0. The  
3 proposed River Ridge Commerce Center Project is a targeted economic  
4 development project ("TED") that will increase capacity on the Company's  
5 transmission system to allow for up to 200 MW additional load. The estimated  
6 investment for this project is \$44 million, and it is expected to be in service by  
7 2025. I will describe how developing the transmission infrastructure in River  
8 Ridge, an area of high interest to businesses looking to relocate or grow in  
9 Indiana, is important not only to the Company, but also the region surrounding  
10 River Ridge and the State of Indiana.

11 In addition, I will provide a high-level overview of a few of the other TED  
12 projects that the Company intends to submit for approval to both the IEDC and  
13 the Commission, as part of future TDSIC 2.0 update proceedings.

14 **II. RIVER RIDGE COMMERCE CENTER PROJECT**

15 **Q. PLEASE DESCRIBE THE RIVER RIDGE COMMERCE CENTER**  
16 **PROJECT.**

17 A. Located along the Ohio River in Clark County, Indiana, River Ridge Commerce  
18 Center is a business and manufacturing park with over 6,000 prime acres of land  
19 under development. Attached to my testimony as Petitioner's Exhibit 1-A is a  
20 map showing the location of River Ridge Commerce Center. The area offers  
21 access to four transportation options – rail, river, runways, and roads. The  
22 transportation options enable quick and inexpensive movement of people,

1 products, materials, and services. Electricity service at River Ridge is provided  
2 exclusively by Duke Energy Indiana. While we currently have available  
3 transmission MW capacity, there are several large potential businesses looking to  
4 locate to River Ridge. To allow for sufficient transmission capacity on the  
5 Company's system and to continue business investment at River Ridge, Duke  
6 Energy Indiana is proposing to invest additional infrastructure at the site, as  
7 discussed further in my testimony below.

8 **Q. WHY IS IT NECESSARY TO INVEST IN THE RIVER RIDGE**  
9 **COMMERCE CENTER PROJECT?**

10 A. With economic development project activity at an all-time high, Duke Energy  
11 Indiana is currently working with more than ten (10) industrial and commercial  
12 customers seeking sites at River Ridge for their new facilities, with the estimated  
13 load totaling more than 500 MW. One of these 10 project commitments would  
14 leave Duke Energy Indiana with limited capacity, unable to compete for the  
15 transformational economic development projects that bring growth in our  
16 communities, growth in Indiana's job market, and benefits to Duke Energy  
17 Indiana customers. Therefore, Duke Energy Indiana is proposing to invest in the  
18 River Ridge Commerce Center to support those economic development projects.

19 **Q. WHAT ARE THE POTENTIAL ECONOMIC IMPACTS OF THE RIVER**  
20 **RIDGE PROJECT?**

21 A. Based on the current project projections, Duke Energy Indiana estimates the River  
22 Ridge Commerce Center Project could create more than 8,000 jobs and bring

1 about \$3 billion in capital investment. The associated wages from those jobs will  
2 positively impact the region, and the capital investment will increase the tax base  
3 and the overall economy within the region and the State of Indiana.

4 **Q. ONCE THESE PROJECTS DEVELOP, HOW DOES DUKE ENERGY**  
5 **INDIANA ENSURE THAT THE PROPOSED BENEFITS IN TERMS OF**  
6 **JOBS AND INVESTMENT MATERIALIZE?**

7 A. Under the Company's existing economic development tariff (Rider 58), the  
8 customer must enter into a Service Agreement with the Company which shall  
9 specify, among other things, the voltage at which the customer will be served, a  
10 description of the amount and nature of the new load and the basis on which the  
11 customer requests qualification for this Rider. The customer must agree to a  
12 minimum term of ten (10) years, with the reductions being available for a  
13 maximum period of five (5) years immediately following the effective date. The  
14 customer must affirm that the availability of this Rider was a factor in the  
15 customer's decision to locate the new load in the Company's service area. If the  
16 customer ceases the operations for which Rider 58 was originally approved, the  
17 Company will require that the Customer repay the Rider 58 reductions received  
18 according to the following schedule: Years 1 to 5, 100% Year 6, 80% Year 7,  
19 60% Year 8, 40% Year 9, 20% Year 10, 10%. The minimum load threshold will  
20 be 500 kW demand. The customer must still receive economic assistance from  
21 state or local government or from another public agency. The customer will also  
22 be required to add a minimum of 10 full time equivalent employees or make a

1 capital investment of at least \$1 million. Any potential investment at River Ridge  
2 would likely come in under Rider 58, or a special contract with similar conditions.

3 **Q. WILL THE PROPOSED RIVER RIDGE COMMERCE CENTER**  
4 **PROJECT HELP ATTRACT MORE ECONOMIC DEVELOPMENT AND**  
5 **CAPITAL INVESTMENT TO THE AREA?**

6 A. Absolutely. As I previously mentioned, River Ridge is a key site in Indiana, and  
7 it is of high interest to prospective customers and existing Indiana businesses  
8 looking to grow and increase capacity. Because customers are expressing their  
9 need for accelerated schedules to stay competitive and to adapt to rapid industry  
10 changes, proactively building the transmission infrastructure will increase the  
11 capacity at River Ridge, which will in turn decrease the time to meet the  
12 customer's schedules, and thus, bring additional capacity to areas of growth and  
13 support existing customers. Furthermore, the proposed infrastructure will attract  
14 new jobs and new capital investment to Indiana.

15 **Q. HOW DOES DUKE ENERGY INDIANA'S PROPOSED RIVER RIDGE**  
16 **COMMERCE CENTER PROJECT FIT WITH THE STATE'S LOCAL**  
17 **AND ECONOMIC DEVELOPMENT EFFORTS?**

18 A. The River Ridge Commerce Center continues to succeed in attracting businesses  
19 to Indiana resulting in new jobs and capital investment in Indiana. This aligns  
20 directly with the IEDC's mission to: (a) attract and support new business  
21 investment; (b) create new jobs for Hoosiers; and (c) further Indiana's legacy as

one of the top states in the nation for business.<sup>1</sup> This project also allows Duke Energy Indiana to work with community partners to achieve their goals, such as One Southern Indiana (“1si”). 1si is a Local Economic Development Organization and Chamber of Commerce for Clark and Floyd Counties.<sup>2</sup> One of 1si’s top goals is to “enhance the area’s vibrancy by facilitating economic transactions that generate wealth and add to community prosperity”.<sup>3</sup> The River Ridge Commerce Center project aligns with IEDC’s and 1si’s mission, as depicted in the letter of support 1si sent to Duke Energy Indiana, attached to my testimony as Petitioner’s Exhibit 1-B.

**Q. WHAT FACILITIES DOES DUKE ENERGY INDIANA NEED TO INSTALL TO EXPAND ITS AVAILABLE SERVICE AT THE RIVER RIDGE COMMERCE CENTER PROJECT?**

A. To extend service to the River Ridge Commerce Center Project, Duke Energy Indiana plans to install 138kV 6-position, 4-breaker ring bus, which will allow Duke Energy Indiana to isolate the substation in the future to provide outage-free maintenance. The Company is also proposing to loop In/Out existing 138kV line 13857, which essentially means that we will add a substation to shorten a longer circuit into two shorter circuits, which will increase reliability. Duke Energy Indiana will be constructing the “high side” or the Transmission side of the substation only, maintaining close proximity to the existing 138kV line. The

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<sup>1</sup> <https://iedc.in.gov/programs>

<sup>2</sup> <https://1si.org/about-us/>

<sup>3</sup> <https://1si.org/app/uploads/2021/02/1si-Strategic-Plan-2020-and-Beyond.pdf>

1 Company will also construct an initial yard for the substation sized to  
2 accommodate a variety of customer-specific scenarios for the “low side” or  
3 Distribution side of the substation. Petitioner’s Confidential Exhibit 1-C provides  
4 additional details on the proposed TED for River Ridge.

5 **Q. DO YOU BELIEVE PUBLIC CONVENIENCE AND NECESSITY**  
6 **REQUIRE THE INCLUSION OF THIS TED PROJECT IN TDSIC 2.0?**

7 A. Yes. As described earlier in my testimony, the River Ridge Commerce Center  
8 project will positively impact the area by facilitating a large economic effect on  
9 the local region, State of Indiana, and Duke Energy Indiana customers.

10 **Q. HAS DUKE ENERGY INDIANA COMPLIED WITH GENERAL**  
11 **ADMINISTRATIVE ORDER 2016-6 (“GAO 2016-6”)?**

12 A. Even though GAO 2016-6 is specific to gas service, Duke Energy Indiana  
13 followed those Commission provisions for this filing. The Company requested  
14 the creation of a sub-docket to address approval of the River Ridge Commerce  
15 Center Project within its Petition establishing this Cause. Duke Energy Indiana  
16 also filed this testimony and exhibits supporting the proposed River Ridge  
17 Commerce Center Project, as required by GAO 2016-6. Furthermore, Duke  
18 Energy Indiana sent a letter to the IEDC for approval to treat the costs associated  
19 with the proposed River Ridge Commerce Center Project as TDSIC costs. A copy  
20 of the Petition filed in this Cause was attached to the letter. A copy of the letter  
21 that was sent to the IEDC is attached to my testimony as Petitioner’s Exhibit 1-D.

1           **III. RIVER RIDGE COMMERCE CENTER PROJECT COSTS**

2   **Q.    DOES THE PROPOSED RIVER RIDGE COMMERCE CENTER**  
3   **PROJECT QUALIFY FOR TED TREATMENT?**

4   A.    Yes, the necessary infrastructure investments to serve River Ridge Commerce  
5          Center Project qualify for TED treatment. The estimated cost of the River Ridge  
6          Commerce Center Project is \$44 million. Treating the River Ridge Commerce  
7          Center Project as a TED project allows Duke Energy Indiana to make the  
8          necessary investment to extend services required by its existing customers.  
9          Furthermore, the extension of services will also provide 200 MW of capacity  
10         which will be required to serve any additional customers who are looking to grow  
11         and increase capacity. The River Ridge Commerce Center Project is an ideal TED  
12         project as it has the support of the local community, as referenced in Petitioner's  
13         Exhibit 1-B.

14 **Q.    HAS DUKE ENERGY INDIANA PREPARED COST ESTIMATES OF**  
15 **THE REQUIRED INFRASTRUCTURE OF THE RIVER RIDGE**  
16 **COMMERCE CENTER PROJECT?**

17 A.    Yes. Please see Petitioner's Confidential Exhibit 1-E for the cost estimate of the  
18         facilities to be installed to serve the River Ridge Commerce Center Project.

19 **Q.    ARE THE ESTIMATED COSTS OF THE RIVER RIDGE COMMERCE**  
20 **CENTER PROJECT JUSTIFIED BY THE INCREMENTAL BENEFITS?**

1 A. Yes. As stated earlier in my testimony, the River Ridge Commerce Center project  
2 could create more than 8,000 jobs and bring about \$3 billion in capital  
3 investment, while only costing \$44 million.

4 **IV. ADDITIONAL TED PROJECTS**

5 **Q. WHAT OTHER TED PROJECTS DOES DUKE ENERGY INDIANA**  
6 **ANTICIPATE DURING TDSIC 2.0?**

7 A. Other TED projects that Duke Energy Indiana expects to have approved during  
8 TDSIC 2.0 timeframe include the Purdue Research Park Aerospace District  
9 located in Tippecanoe County and the Hamilton County service territory. The  
10 Company's Purdue Aerospace District investment will likely increase capacity on  
11 the Company's transmission system to allow for up to 300 MW of additional load.  
12 The estimated investment for this project is \$65 million and would potentially be  
13 in service by 2027. In addition, Duke Energy Indiana's proposed investment in  
14 the Hamilton County area would increase capacity on the Company's  
15 transmission system to allow for up to 100 MW of additional load. The estimated  
16 investment for this project is \$25 million and would potentially be in service by  
17 2028.

18 **Q. IS THERE POTENTIAL FOR ADDITIONAL TED PROJECTS**  
19 **THROUGHOUT THE SIX YEARS OF THE TDSIC 2.0 PLAN THAT**  
20 **HAVE NOT YET BEEN IDENTIFIED?**

21 A. Yes, this is very likely. Considering the robust pipeline of economic development  
22 projects in the State, including commercial and industrial customers considering

1 the Company's service territory for their new and expanding operations, Duke  
2 Energy Indiana could very easily see the need for additional TED projects in the  
3 next six years.

4 **Q. IS DUKE ENERGY INDIANA SEEKING APPROVAL OF THESE**  
5 **POTENTIAL FUTURE TED PROJECTS IN THIS FILING?**

6 A. No. We are simply outlining potential TED projects the Company anticipates  
7 during the life of TDSIC 2.0. We will update the Commission as these TED  
8 projects are further developed.

9 **Q. HOW DOES DUKE ENERGY INDIANA PLAN TO UPDATE THE**  
10 **COMMISSION ON FUTURE TED PROJECTS?**

11 A. Duke Energy Indiana would include updated information regarding the scope,  
12 timing and cost of any TED project as part of its regular, semi-annual TDSIC  
13 Rider and update filings.

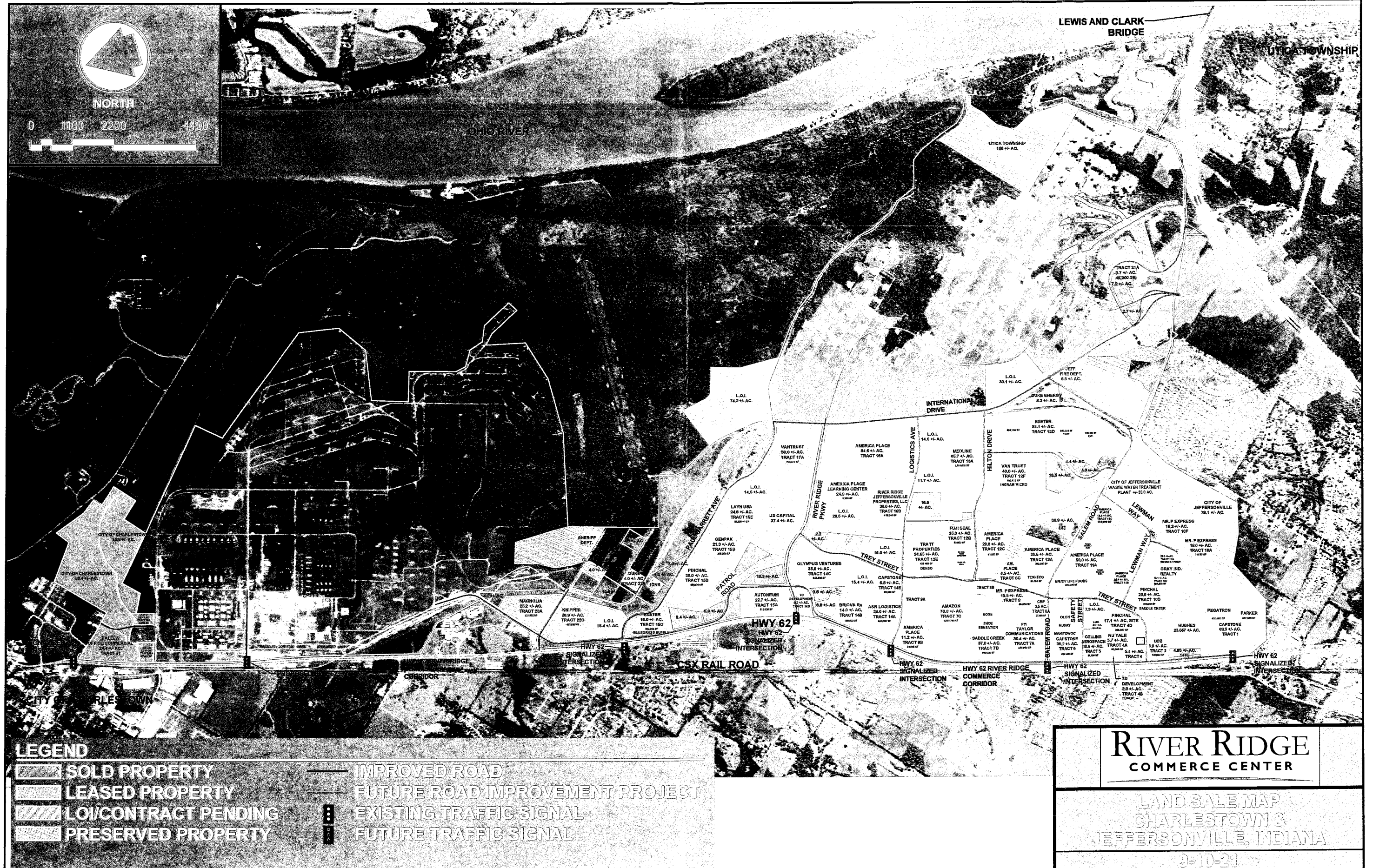
14 **V. CONCLUSION**

15 **Q. WERE PETITIONER'S EXHIBITS 1-A, 1-B, 1-D, AND CONFIDENTIAL**  
16 **EXHIBITS 1-C AND 1-E PREPARED BY YOU OR AT YOUR**  
17 **DEPARTMENT'S DIRECTION?**

18 A. Yes, they were.

19 **Q. DOES THIS CONCLUDE YOUR PREFILED TESTIMONY?**

20 A. Yes, it does.





4100 Charlestown Road | New Albany, IN 47150  
Phone: 812.945.0266 | Fax: 812.948-4664 | [www.1si.org](http://www.1si.org)

November 22, 2021

Mr. Stan Pinegar  
Duke Energy Indiana  
1000 East Main Street  
Plainfield, IN 46168

Dear Mr. Pinegar:

One Southern Indiana (1si) is the chamber of commerce and local economic development organization for Clark, Floyd and Scott counties in Southern Indiana. 1si proactively works to grow our regional economy through business attraction, retention and expansion; through encouraging and supporting entrepreneurs and workforce development; and through providing government and workforce advocacy, business education, networking opportunities and other business services to our members and investors.

Included in our economic development territory is the River Ridge Commerce Center, a world-class business and manufacturing park with over 6,000 prime acres of land under development along the Ohio River. River Ridge features three unique locations – an industrial park, an office and research campus, and a 1,400-acre megasite. 1si partners with the River Ridge Development Authority, local governments and the Indiana Economic Development Corporation to facilitate economic growth within the park and throughout the neighboring communities.

1si is pleased to offer a letter of support for Duke Energy Indiana's proposed Transmission, Distribution and Storage Improvement Charge (TDSIC) Plan. Duke Energy Indiana's TDSIC program will allow for proactive infrastructure improvements that directly impact continued economic growth and the ability for Indiana to attract and compete effectively for new industrial and commercial development. The program will support Duke Energy's ability to upgrade electric infrastructure in the Southern Indiana region – including the River Ridge Commerce Center.

The TDSIC plan is critical for the business park and our region to provide a rapid response to prospects looking to locate new or expand existing facilities in Duke Energy's Indiana service territory. The proposed growth would create opportunities and make a positive impact on the quality of life for residents across Southern Indiana, creating new jobs and investment to the thriving region.

I appreciate your dedication to this project and the broad economic development benefits this infrastructure improvement plan will provide to our region's growing business environment, quality of life and Duke Energy Indiana customers.

Sincerely,

A handwritten signature in cursive script that reads 'Wendy Dant Chesser'.

Wendy Dant Chesser  
President & CEO

**PETITIONER'S EXHIBIT 1-C IS CONFIDENTIAL**



Duke Energy Indiana, LLC  
1000 East Main Street  
Plainfield, IN 46168

ERIN N. SCHNEIDER  
Director of Economic Development

*Erin N. Schneider*  
[Erin.Schneider@duke-energy.com](mailto:Erin.Schneider@duke-energy.com)

Sent via email to: [Bchambers@iedc.in.gov](mailto:Bchambers@iedc.in.gov) & [mwasky@iedc.in.gov](mailto:mwasky@iedc.in.gov)

November 23, 2021

Mr. Brad Chambers  
Indiana Economic Development Corporation  
One North Capitol, Suite 700  
Indianapolis, IN 46204

RE: River Ridge Commerce Center—Targeted Economic Development Project (“TED Project”)—Electric Service

Dear Mr. Chambers:

We are eager to aid Indiana in advancing its economic development efforts. With economic development project activity at an all-time high, Duke Energy Indiana is proposing to invest additional infrastructure at the River Ridge Commerce Center in Clark County, Indiana.

River Ridge Commerce Center is a business and manufacturing park with over 6,000 prime acres of land under development, making it a key asset to economically transform Indiana communities. Therefore, Duke Energy Indiana is petitioning the Indiana Utility Regulatory Commission (“IURC”) for approval of River Ridge Commerce Center Project (“River Ridge Project”) as a TED Project as part of our transmission, distribution, and storage system improvement charge six-year investment plan (“TDSIC 2.0”). Attached for your reference is a copy of the TDSIC 2.0 Verified Petition filed with the IURC today, under Cause No. 45647.

Although the IURC’s process established in General Administrative Order (“GAO”) 2016-6 is specific to gas service, Duke Energy Indiana will follow those provisions for its TDSIC 2.0 TED Project proposal. Per GAO 2016-6 and Ind. Code § 8-1-39-11, please accept this letter as an official request by Duke Energy Indiana to designate the River Ridge Project as a TED and to treat the costs associated with River Ridge as TDSIC costs.

If you have any questions or concerns about this request, please don’t hesitate to reach out to me via email at [Erin.Schneider@duke-energy.com](mailto:Erin.Schneider@duke-energy.com), or at (818) 749-6401. I look forward to your response.

cc: Mr. Mark Wasky

Sincerely,

A handwritten signature in dark ink, appearing to read 'Erin Schneider', written in a cursive style.

Erin Schneider  
Director of Economic Development

FILED  
November 23, 2021  
INDIANA UTILITY  
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF DUKE ENERGY )  
INDIANA, LLC FOR; (1) APPROVAL OF )  
PETITIONER'S 6-YEAR PLAN FOR )  
ELIGIBLE TRANSMISSION, )  
DISTRIBUTION AND STORAGE SYSTEM )  
IMPROVEMENTS, PURSUANT TO ) CAUSE NO. 45647  
IND. CODE § 8-1-39-10; (2) APPROVAL OF A )  
TRANSMISSION AND DISTRIBUTION )  
INFRASTRUCTURE IMPROVEMENT COST )  
RATE ADJUSTMENT AND DEFERRALS, )  
PURSUANT TO IND. CODE §§ 8-1-2-10, 8-1-2- )  
12, 8-1-2-14, AND 8-1-39-1 *ET SEQ*; AND (3) )  
APPROVAL OF A TARGETED ECONOMIC )  
DEVELOPMENT PROJECT AND )  
RECOVERY OF COSTS ASSOCIATED WITH )  
THE PROJECT, PURSUANT TO IND. CODE )  
§§ 8-1-39-10 AND 8-1-39-11 )

**VERIFIED PETITION**

Duke Energy Indiana, LLC (hereinafter referred to as "Petitioner," "Company" or "Duke Energy Indiana") respectfully petitions the Indiana Utility Regulatory Commission ("Commission") for: (1) approval of Petitioner's 6-year plan for eligible transmission, distribution and storage system improvements ("TDSIC 2.0") pursuant to Ind. Code § 8-1-39-10; (2) approval of a Transmission and Distribution Infrastructure Improvement Cost Rate Adjustment and deferrals pursuant to Ind. Code § 8-1-39-9; and (3) approval of a targeted economic development project and recovery of costs associated with the project, pursuant to Ind. Code § 8-1-39-10 and 8-1-39-11. In support of this Verified Petition, Duke Energy Indiana states as follows:

1. **Petitioner's Corporate and Regulated Status.** Duke Energy Indiana is a public utility corporation organized and existing under the laws of the State of Indiana with its principal office at 1000 E. Main Street, Plainfield, Indiana 46168, and is a wholly-owned subsidiary of Duke

Energy Indiana Holdco, LLC. It has the corporate power and authority to engage in the business of supplying electric utility service to the public in the State of Indiana. Accordingly, Petitioner is a “public utility” within the meaning of that term as used in the Indiana Public Service Commission Act, as amended, Ind. Code § 8-1-2-1 *et seq.*, and specifically, as used in Ind. Code § 8-1-39-4, and is subject to the jurisdiction of the Commission in the manner and to the extent provided by the laws of the State of Indiana, including Ind. Code § 8-1-2-1 *et seq.*

2. **Petitioner’s Electric Utility Service.** Duke Energy Indiana owns, operates, manages and controls plants, properties and equipment used and useful for the production, transmission, distribution and furnishing of electric utility service to the public in the State of Indiana. It directly supplies electric energy throughout its 22,000 square mile service area to approximately 860,000 customers located in 69 counties in the State of Indiana. Petitioner also sells electric energy for resale to Wabash Valley Power Alliance, Indiana Municipal Power Agency and to other public utilities that in turn supply electric utility service to numerous customers in areas not served directly by Petitioner.

3. **Relief Requested.** Petitioner respectfully requests Commission approval of its TDSIC 2.0 investment plan, which also includes a targeted economic development project, in accordance with Ind. Code § 8-1-39-10. Specifically, Petitioner requests: (a) a finding that the projects contained in TDSIC 2.0 are “eligible transmission, distribution, and storage system improvements” within the meaning of Ind. Code § 8-1-39-2; (b) a finding of the best estimate of the cost of the eligible improvements included in TDSIC 2.0; (c) a determination that the public convenience and necessity require or will require the eligible improvements included in TDSIC 2.0; and (d) a determination that the estimated costs of the eligible improvements included in TDSIC 2.0 are justified by incremental benefits attributable to the TDSIC Plan. If and to the extent

the Commission determines that TDSIC 2.0 is reasonable, Duke Energy Indiana requests the Commission approve TDSIC 2.0, and designate the eligible transmission, distribution and storage system improvements included in TDSIC 2.0 as eligible for Transmission, Distribution and Storage System Improvement Charge treatment in accordance with Ind. Code § 8-1-39-9. Petitioner requests the Commission approve its ratemaking proposals, including recovery of 80% of the TDSIC 2.0 costs via Standard Contract Rider No. 65 ("TDSIC Rider"), and deferral with carrying costs of 20% of the TDSIC 2.0 costs for subsequent recovery in Petitioner's next general retail electric base rate case. Petitioner also requests that the Commission approve Petitioner's proposed process for updating the TDSIC 2.0 Plan in future annual proceedings.

4. **Allocation Factors.** Ind. Code § 8-1-39-9(a)(1) requires Petitioner to use the customer class revenue allocation factors based on firm load approved in the public utility's most recent retail base rate case order. Petitioner is proposing that the TDSIC 2.0 costs be allocated in conformity with the revenue allocation factors approved in its last retail base rate case (Cause No. 45253).

5. **TDSIC 2.0 Plan Projects.** In accordance with Ind. Code § 8-1-39-9(a), Petitioner's TDSIC 2.0 investment plan and associated ratemaking requests are detailed in the prefiled case-in-chief testimony, exhibits and workpapers of Duke Energy Indiana. The TDSIC 2.0 projects and expenditures are specifically found in the following Duke Energy Indiana exhibits and workpapers, which have been filed concurrent with this Petition. The first Exhibit referenced below is attached hereto as Attachment 1. However, due to the voluminous nature of the remainder of the exhibits, they are incorporated into this Petition by reference, as required in Ind. Code § 8-1-39-9(a)(2).

6. **Duke Energy Indiana TDSIC 2.0 Exhibits and Workpapers.**

- Cost Estimate Overview for all TDSIC 2.0 Projects – Petitioner’s Exhibit 2-A (JKL)
- Distribution Circuit Detailed Cost Estimates – Petitioner’s Confidential Exhibit 2-B (JKL)
- Distribution Circuit Workplan – Petitioner’s Confidential Exhibit 2-C (JKL)
- Sortable Excel of Distribution Circuit Workplan – Petitioner’s Confidential Workpaper 1-JKL
- Transmission & Distribution Substation and Transmission Line Detailed Cost Estimates – Petitioner’s Confidential Exhibit 3-A (MDD)
- Sortable Excel of Transmission Substation Workplan – Petitioner’s Confidential Workpaper 1-MDD
- Sortable Excel of Transmission Line Workplan – Petitioner’s Confidential Workpaper 2-MDD
- Black & Veatch Investment Plan Report – Petitioner’s Exhibit 4-A (JWS)

7. **Estimated Customer Rate Impact.** In accordance with Ind. Code § 8-1-39-9(a)(3), Petitioner is required to project the effects of TDSIC 2.0 on retail rates and charges. The estimated annual rate impacts for the proposed TDSIC Rider are shown on the chart below:

<b>Duke Energy Indiana T&amp;D Infrastructure Improvement Cost Rate Adjustment Average Annual Retail Rate Impact</b>						
2024	2025	2026	2027	2028	2029	AVG
0.52%	1.88%	1.05%	1.44%	1.00%	0.12%	0.86%

8. **Timing of Petition.** In accordance with Ind. Code § 8-1-39-9(d), Petitioner is not filing this petition within nine (9) months after the date on which the Commission issued an order

changing Petitioner's basic rates and charges. The date of Petitioner's most recent retail base rate order was June 29, 2020 in Cause No. 45253.

9. **Procedural Schedule.** Pursuant to 170 IAC 1-1.1-9, Petitioner, the Indiana Office of Utility Consumer Counselor ("OUCC"), and the following parties reasonably anticipated to participate in this proceeding: Citizens Action Coalition of Indiana, Inc., Duke Energy Industrial Group, Nucor Steel-Indiana, and Steel Dynamics, Inc. (collectively the "Parties") are in agreement with the following procedural schedule:

- (i) November 23, 2021 – Duke Energy Indiana files its Petition and case-in-chief testimony;
- (ii) February 16, 2022 – OUCC and Intervenors shall file their respective cases-in-chief;
- (iii) March 9, 2022 – Duke Energy Indiana shall file its rebuttal testimony;
- (iv) March 9, 2022 – OUCC and Intervenors shall file any cross-answering testimony;
- (v) Pursuant to Ind. Code § 8-1-39-10, Petitioner requests a hearing be conducted not more than 120 days from the date of this Petition. If the Commission's schedule allows, Petitioner, OUCC, and Parties request that the Commission schedule an evidentiary hearing on March 23, 2022.
- (vi) Pursuant to Ind. Code § 8-1-39-10, Petitioner requests a final Commission order approving the relief sought in this Petition by June 21, 2022, which is not more than 210 days from the date this petition is filed.

Any response to formal discovery should be made within ten (10) calendar days of the receipt of such request. Responses to formal discovery should be made within five (5) calendar days after rebuttal. Any discovery requests served after 5:00 p.m. EDT Monday through Thursday

or noon on a Friday or before a state holiday shall be deemed received on the following business day. Petitioner, OUCC, and the Parties agree that there will be blackout dates for discovery from December 23, 2021 through January 3, 2022. Dates designated as “blackout dates” shall not be included in determining the number of days provided for responding to a discovery request. Petitioner, OUCC, and Parties consent to electronic discovery.

10. **Applicable Law.** Duke Energy Indiana considers Indiana Code §§ 8-1-2-19, -23 and Ind. Code Ch. 8-1-39, among others, as applicable to the subject matter of this proceeding and believes that such statutes provide the Commission authority to approve the requested relief.

11. **Targeted Economic Development Project.** Petitioner requests that the Commission establish a subdocket to address approval of the proposed River Ridge Commerce Center Project as a targeted economic development project (“TED”), as detailed in the prefiled case-in-chief testimony and exhibits of Ms. Erin Schneider, which would constitute Petitioner’s case-in-chief testimony for the TED subdocket. Petitioner considers the provisions of the Public Service Commission Act, as amended, including Ind. Code Ch. 8-1-39 among others, to be applicable to Petitioner’s request for TED approval. Additionally, in accordance with General Administrative Order 2016-6 (“GAO 2016-6”), Petitioner is applying to the Indiana Economic Development Corporation (“IEDC”) for approval to treat costs associated with the proposed TED project as TDSIC costs. In the past the IEDC has been supportive of TED projects in River Ridge. In addition, Petitioner requests the following procedural schedule related to the subdocket proceeding:

- (i) November 23, 2021 – Duke Energy Indiana files its case-in-chief testimony;
- (ii) January 25, 2022 – OUCC and Intervenors shall file their respective cases-in-chief;
- (iii) January 31, 2022 – Duke Energy Indiana shall file its rebuttal testimony;

(iv) Week of February 14, 2022 – Evidentiary Hearing;

(v) While the Petitioner is entitled to issuance of an order within ninety (90) days, Petitioner is proposing a schedule that affords the Commission one hundred and twenty (120) days.

12. **Petitioner's Counsel.** Andrew J. Wells and Elizabeth A. Heneghan at 1000 East Main Street, Plainfield, Indiana 46168 are counsel for Petitioner in this matter and are duly authorized to accept service of papers in this Cause on behalf of Petitioner.

WHEREFORE, Duke Energy Indiana requests that the Commission promptly publish notice, make such investigation and hold such hearings as are necessary and advisable, and thereafter make and enter an order in this Cause:

- (a) Finding that the projects contained in TDSIC 2.0 are “eligible transmission, distribution, and storage system improvements” within the meaning of Ind. Code § 8-1-39-2;
- (b) Finding that Duke Energy Indiana has provided the best estimate of the costs of the eligible improvements included in TDSIC 2.0;
- (c) Determining that the public convenience and necessity require or will require the eligible improvements included in TDSIC 2.0;
- (d) Determine that the estimated costs of the eligible improvements included in TDSIC 2.0 are justified by incremental benefits attributable to TDSIC 2.0;
- (e) Approving TDSIC 2.0 as reasonable and designating the eligible transmission, distribution and storage system improvements included in TDSIC 2.0 as TDSIC Costs eligible for Transmission, Distribution and Storage System Improvement Charge treatment in accordance with Ind. Code § 8-1-39-9;

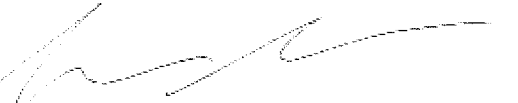
- (f) Approving the T&D Infrastructure Improvement Cost Rate Adjustment, Standard Contract Rider No. 65, for timely recovery of 80% of the 6-Year TDSIC 2.0 cost, and deferral with carrying costs of 20% of TDSIC 2.0 costs for recovery as part of Petitioner's next general base retail electric rate case filed with the Commission;
- (g) Approving as a regulatory asset the deferred amounts;
- (h) Approving Petitioner's proposed process for updating TDSIC 2.0 in future annual proceedings;
- (i) Establishing a subdocket to address the River Ridge Commerce Center TED Project;  
and
- (j) Granting to Petitioner such additional and further relief as may be deemed necessary or appropriate.

Dated as of the 23<sup>rd</sup> day of November, 2021.

Respectfully submitted,

**DUKE ENERGY INDIANA, LLC**

By:



Counsel for Duke Energy Indiana, LLC

Andrew J. Wells, Atty. No. 29545-49  
Elizabeth A. Heneghan, Atty No. 24942-49  
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**VERIFICATION**

I, Stan C. Pinegar, hereby verify under the penalties of perjury that the foregoing Verified Petition is true and accurate to the best of my information, knowledge, and belief.

  
Stan C. Pinegar, President

November 23, 2021

Date

Duke Energy Indiana, LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was hand delivered or electronically delivered this 23<sup>rd</sup> day of November, 2021, to the following:

Jeffrey Reed  
Randall C. Helmen  
Indiana Office of Utility Consumer Counselor  
PNC Center  
115 W. Washington Street  
Suite 1500 South  
Indianapolis, IN 46204  
[jreed@oucc.in.gov](mailto:jreed@oucc.in.gov)  
[rhelmen@oucc.in.gov](mailto:rhelmen@oucc.in.gov)  
[infomgt@oucc.in.gov](mailto:infomgt@oucc.in.gov)

In addition, copies have been distributed electronically, for informational purposes, to the following:

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Dated this 23<sup>rd</sup> day of November 2021.

By:

  
Counsel for Duke Energy Indiana, Inc.

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Elizabeth A. Heneghan, Atty No. 24942-49  
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**ATTACHMENT 1**

PETITIONER'S EXHIBIT 2-A (JKL)  
DEI TDSIC 2.0  
PAGE 1 of 12

Duke Energy Indiana - TDSIC 2.0 Infrastructure Improvement Plan				
6 Year Summary				
Distribution System Improvements				
Line No.	Project Category	2023-2028 Capital Additions	2023-2028 O&M	2023-2028 Capital & O&M Total
1	Distribution System Circuit Improvements	\$704,060,933	\$108,273,358	\$812,334,291
2	Distribution System Substation Improvements	\$176,965,506	\$41,837	\$177,007,344
3	Total Distribution - Contingency	\$155,475,254	\$0	\$155,475,254
4	Total Distribution Improvements	\$1,036,501,694	\$108,315,195	\$1,144,816,889
Transmission System Improvements				
5	Transmission System Line Improvements	\$494,662,048	\$22,610,931	\$517,272,980
6	Transmission System Substation Improvements	\$198,038,203	\$0	\$198,038,203
7	Total Transmission - Contingency	\$122,241,221	\$0	\$122,241,221
8	Total Transmission Improvements	\$814,941,472	\$22,610,931	\$837,552,403
9	Total TDSIC 2.0 Improvements	\$1,851,443,166	\$130,926,126	\$1,982,369,292
10	Targeted Economic Development - Identified Projects	\$44,143,497	\$0	\$44,143,497
11	Targeted Economic Development - Potential Transmission Improvements	\$90,000,000	\$0	\$90,000,000
12	Total Targeted Economic Development - Contingency	\$23,672,382	\$0	\$23,672,382
13	Total Investment Plan	\$2,009,259,044	\$130,926,126	\$2,140,185,171

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PETITIONER'S EXHIBIT 2-A (JKL)  
DEI TDSIC 2.0  
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Duke Energy Indiana - T & D Infrastructure Improvement Plan							
6 Year Summary By Year							
Distribution System Improvements							
Line No.	Project Category	2023 Capital Additions	2023 O&M	2023 Capital & O&M Total	2024 Capital Additions	2024 O&M	2024 Capital & O&M Total
1	Distribution System Circuit Improvements - TDSIC 2.0	\$86,070,023	\$17,975,406	\$104,045,429	\$95,838,470	\$14,658,664	\$110,497,134
2	Distribution System Substation Improvements - TDSIC 2.0	\$14,493,107	\$41,837	\$14,534,945	\$18,052,441	\$0	\$18,052,441
3	Total Distribution - Contingency - TDSIC 2.0	\$17,746,435	\$0	\$17,746,435	\$20,098,396	\$0	\$20,098,396
4	Total Distribution Improvements - TDSIC 2.0	\$118,309,565	\$18,017,244	\$136,326,809	\$133,989,307	\$14,658,664	\$148,647,971
5	Cumulative Distribution Improvements - TDSIC 2.0	\$118,309,565	\$18,017,244	\$136,326,809	\$252,298,872	\$32,675,908	\$284,974,779
Transmission System Improvements							
6	Transmission System Line Improvements - TDSIC 2.0	\$35,900,449	\$2,862,794	\$38,763,243	\$58,015,946	\$2,661,355	\$60,677,301
7	Transmission System Substation Improvements - TDSIC 2.0	\$26,046,227	\$0	\$26,046,227	\$47,816,638	\$0	\$47,816,638
8	Total Transmission - Contingency - TDSIC 2.0	\$10,931,766	\$0	\$10,931,766	\$18,676,338	\$0	\$18,676,338
9	Total Transmission Improvements - TDSIC 2.0	\$72,878,442	\$2,862,794	\$75,741,236	\$124,508,922	\$2,661,355	\$127,170,277
10	Cumulative Transmission Improvements - TDSIC 2.0	\$72,878,442	\$2,862,794	\$75,741,236	\$197,387,364	\$5,524,149	\$202,911,513
11	Total T & D Improvements - TDSIC 2.0	\$191,188,007	\$20,880,038	\$212,068,044	\$258,498,229	\$17,320,019	\$275,818,248
12	Cumulative T & D Improvements - TDSIC 2.0	\$191,188,007	\$20,880,038	\$212,068,044	\$449,686,235	\$38,200,057	\$487,886,292

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PETITIONER'S EXHIBIT 2-A (JKL)  
DEI TDSIC 2.0  
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Duke Energy Indiana - T & D Infrastructure Improvement Plan							
6 Year Summary By Year							
Distribution System Improvements							
Line No.	Project Category	2025 Capital Additions	2025 O&M	2025 Capital & O&M Total	2026 Capital Additions	2026 O&M	2026 Capital & O&M Total
1	Distribution System Circuit Improvements - TDSIC 2.0	\$119,415,156	\$16,548,331	\$135,963,487	\$126,131,284	\$17,941,286	\$144,072,570
2	Distribution System Substation Improvements - TDSIC 2.0	\$67,758,300	\$0	\$67,758,300	\$40,531,401	\$0	\$40,531,401
3	Total Distribution - Contingency - TDSIC 2.0	\$33,030,610	\$0	\$33,030,610	\$29,411,062	\$0	\$29,411,062
4	Total Distribution Improvements - TDSIC 2.0	\$220,204,066	\$16,548,331	\$236,752,397	\$196,073,747	\$17,941,286	\$214,015,033
5	Cumulative Distribution Improvements - TDSIC 2.0	\$472,502,938	\$49,224,238	\$521,727,176	\$668,576,685	\$67,165,525	\$735,742,209
Transmission System Improvements							
6	Transmission System Line Improvements - TDSIC 2.0	\$141,075,955	\$3,704,375	\$144,780,330	\$107,008,432	\$3,097,939	\$110,106,371
7	Transmission System Substation Improvements - TDSIC 2.0	\$19,402,294	\$0	\$19,402,294	\$38,242,832	\$0	\$38,242,832
8	Total Transmission - Contingency - TDSIC 2.0	\$28,319,691	\$0	\$28,319,691	\$25,632,576	\$0	\$25,632,576
9	Total Transmission Improvements - TDSIC 2.0	\$188,797,941	\$3,704,375	\$192,502,315	\$170,883,840	\$3,097,939	\$173,981,779
10	Cumulative Transmission Improvements - TDSIC 2.0	\$386,185,305	\$9,228,524	\$395,413,828	\$557,069,144	\$12,326,463	\$569,395,607
11	Total T & D Improvements - TDSIC 2.0	\$409,002,007	\$20,252,705	\$429,254,712	\$366,957,587	\$21,039,225	\$387,996,812
12	Cumulative T & D Improvements - TDSIC 2.0	\$858,688,242	\$58,452,762	\$917,141,004	\$1,225,645,829	\$79,491,987	\$1,305,137,816

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PETITIONER'S EXHIBIT 2-A (JKL)  
DEI TDSIC 2.0  
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Duke Energy Indiana - T & D Infrastructure Improvement Plan  
6 Year Summary By Year

Distribution System Improvements							
Line No.	Project Category	2027 Capital Additions	2027 O&M	2027 Capital & O&M Total	2028 Capital Additions	2028 O&M	2028 Capital & O&M Total
1	Distribution System Circuit Improvements - TDSIC 2.0	\$132,418,981	\$19,685,394	\$152,104,375	\$144,187,021	\$21,464,276	\$165,651,297
2	Distribution System Substation Improvements - TDSIC 2.0	\$20,911,112	\$0	\$20,911,112	\$15,219,145	\$0	\$15,219,145
3	Total Distribution - Contingency - TDSIC 2.0	\$27,058,252	\$0	\$27,058,252	\$28,130,500	\$0	\$28,130,500
4	Total Distribution Improvements - TDSIC 2.0	\$180,388,344	\$19,685,394	\$200,073,738	\$187,536,665	\$21,464,276	\$209,000,941
5	Cumulative Distribution Improvements - TDSIC 2.0	\$848,965,029	\$86,850,919	\$935,815,948	\$1,036,501,694	\$108,315,195	\$1,144,816,889
Transmission System Improvements							
6	Transmission System Line Improvements - TDSIC 2.0	\$85,638,312	\$7,895,606	\$93,533,918	\$67,022,954	\$2,388,862	\$69,411,816
7	Transmission System Substation Improvements - TDSIC 2.0	\$26,363,501	\$0	\$26,363,501	\$40,166,711	\$0	\$40,166,711
8	Total Transmission - Contingency - TDSIC 2.0	\$19,765,026	\$0	\$19,765,026	\$18,915,823	\$0	\$18,915,823
9	Total Transmission Improvements - TDSIC 2.0	\$131,766,839	\$7,895,606	\$139,662,445	\$126,105,489	\$2,388,862	\$128,494,351
10	Cumulative Transmission Improvements - TDSIC 2.0	\$688,835,983	\$20,222,069	\$709,058,052	\$814,941,472	\$22,610,931	\$837,552,403
11	Total T & D Improvements - TDSIC 2.0	\$312,155,183	\$27,581,001	\$339,736,183	\$313,642,154	\$23,853,138	\$337,495,292
12	Cumulative T & D Improvements - TDSIC 2.0	\$1,537,801,012	\$107,072,988	\$1,644,874,000	\$1,851,443,166	\$130,926,126	\$1,982,369,292

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PETITIONER'S EXHIBIT 2-A (JKL)  
DEI TDSIC 2.0  
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Duke Energy Indiana - T & D Infrastructure Improvement Plan				
6 Year Summary By Year				
Distribution System Improvements				
Line No.	Project Category	6 Year Capital Additions	6 Year O&M	6 Year Capital & O&M Total
1	Distribution System Circuit Improvements - TDSIC 2.0	\$704,060,933	\$108,273,358	\$812,334,291
2	Distribution System Substation Improvements - TDSIC 2.0	\$176,965,506	\$41,837	\$177,007,344
3	Total Distribution - Contingency - TDSIC 2.0	\$155,475,254	\$0	\$155,475,254
4	Total Distribution Improvements - TDSIC 2.0	\$1,036,501,694	\$108,315,195	\$1,144,816,889
5	Cumulative Distribution Improvements - TDSIC 2.0	\$1,036,501,694	\$108,315,195	\$1,144,816,889
Transmission System Improvements				
6	Transmission System Line Improvements - TDSIC 2.0	\$494,662,048	\$22,610,931	\$517,272,980
7	Transmission System Substation Improvements - TDSIC 2.0	\$198,038,203	\$0	\$198,038,203
8	Total Transmission - Contingency - TDSIC 2.0	\$122,241,221	\$0	\$122,241,221
9	Total Transmission Improvements - TDSIC 2.0	\$814,941,472	\$22,610,931	\$837,552,403
10	Cumulative Transmission Improvements - TDSIC 2.0	\$814,941,472	\$22,610,931	\$837,552,403
11	Total T & D Improvements - TDSIC 2.0	\$1,851,443,166	\$130,926,126	\$1,982,369,292
12	Cumulative T & D Improvements - TDSIC 2.0	\$1,851,443,166	\$130,926,126	\$1,982,369,292

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Duke Energy Indiana - T & D Infrastructure Improvement Plan

6 Year Detailed Summary By Year

Distribution System Improvements

Line No.	Project Category	2023 Material	2023 Labor	2023 Indirects	2023 AFUDC	2023 Total Capital Additions	2023 O&M	2023 Capital and O&M	2023 Retirements	2023 Total Project
1	Distribution System Circuit Improvements	\$21,611,814	\$41,675,052	\$20,455,932	\$2,327,224	\$86,070,023	\$17,975,406	\$104,045,429	\$19,215,447	\$123,260,876
2	Distribution System Substation Improvements	\$4,985,306	\$6,790,365	\$2,101,254	\$616,182	\$14,493,107	\$41,837	\$14,534,945	\$2,359,223	\$16,894,168
3	Total Distribution Improvements	\$26,597,120	\$48,465,418	\$22,557,186	\$2,943,406	\$100,563,130	\$18,017,244	\$118,580,374	\$21,574,670	\$140,155,044
Transmission System Improvements										
4	Transmission System Line Improvements	\$8,213,869	\$20,891,917	\$5,863,430	\$931,233	\$35,900,449	\$2,862,794	\$38,763,243	\$3,429,486	\$42,192,728
5	Transmission System Substation Improvements	\$8,330,976	\$13,440,251	\$4,013,037	\$1,217,027	\$26,046,227	\$0	\$26,046,227	\$2,866,589	\$28,912,816
6	Total Transmission Improvements	\$16,544,845	\$34,332,168	\$9,876,467	\$2,148,261	\$61,946,675	\$2,862,794	\$64,809,469	\$6,296,075	\$71,105,544
7	Total T & D Improvements	\$43,141,965	\$82,797,586	\$32,433,653	\$5,091,666	\$162,509,806	\$20,880,038	\$183,389,843	\$27,870,745	\$211,260,588

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Duke Energy Indiana - T & D Infrastructure Improvement Plan  
6 Year Detailed Summary By Year  
Distribution System Improvements

Line No.	Project Category	2024 Material	2024 Labor	2024 Indirects	2024 AFUDC	2024 Total Capital Additions	2024 O&M	2024 Capital and O&M	2024 Retirements	2024 Total Project
1	Distribution System Circuit Improvements	\$24,400,105	\$46,786,550	\$21,609,669	\$3,042,146	\$95,838,470	\$14,658,664	\$110,497,134	\$20,983,652	\$131,480,786
2	Distribution System Substation Improvements	\$6,342,343	\$8,096,259	\$2,800,538	\$813,300	\$18,052,441	\$0	\$18,052,441	\$981,149	\$19,033,589
3	Total Distribution Improvements	\$30,742,449	\$54,882,809	\$24,410,206	\$3,855,447	\$113,890,911	\$14,658,664	\$128,549,575	\$21,964,801	\$150,514,375
Transmission System Improvements										
4	Transmission System Line Improvements	\$12,371,231	\$34,799,480	\$9,247,730	\$1,597,506	\$58,015,946	\$2,661,355	\$60,677,301	\$8,244,755	\$68,922,056
5	Transmission System Substation Improvements	\$17,216,557	\$21,963,154	\$6,958,181	\$1,678,746	\$47,816,638	\$0	\$47,816,638	\$2,617,636	\$50,434,273
6	Total Transmission Improvements	\$29,587,787	\$56,762,634	\$16,205,911	\$3,276,252	\$105,832,584	\$2,661,355	\$108,493,939	\$10,862,391	\$119,356,330
7	Total T & D Improvements	\$60,330,236	\$111,645,443	\$40,616,117	\$7,131,698	\$219,723,494	\$17,320,019	\$237,043,513	\$32,827,191	\$269,870,705

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Duke Energy Indiana - T & D Infrastructure Improvement Plan  
6 Year Detailed Summary By Year  
Distribution System Improvements

Line No.	Project Category	2025 Material	2025 Labor	2025 Indirects	2025 AFUDC	2025 Total Capital Additions	2025 O&M	2025 Capital and O&M	2025 Retirements	2025 Total Project
1	Distribution System Circuit Improvements	\$31,931,771	\$56,847,172	\$27,049,867	\$3,586,346	\$119,415,156	\$16,548,331	\$135,963,487	\$23,920,905	\$159,884,392
2	Distribution System Substation Improvements	\$20,670,588	\$33,115,809	\$10,887,924	\$3,083,979	\$67,758,300	\$0	\$67,758,300	\$3,200,811	\$70,959,112
3	Total Distribution Improvements	\$52,602,358	\$89,962,981	\$37,937,791	\$6,670,325	\$187,173,456	\$16,548,331	\$203,721,787	\$27,121,716	\$230,843,504
Transmission System Improvements										
4	Transmission System Line Improvements	\$20,239,503	\$92,369,757	\$24,159,173	\$4,307,522	\$141,075,955	\$3,704,375	\$144,780,330	\$12,387,550	\$157,167,880
5	Transmission System Substation Improvements	\$5,736,954	\$9,878,242	\$3,112,939	\$674,160	\$19,402,294	\$0	\$19,402,294	\$1,125,311	\$20,527,606
6	Total Transmission Improvements	\$25,976,457	\$102,247,999	\$27,272,111	\$4,981,681	\$160,478,250	\$3,704,375	\$164,182,624	\$13,512,861	\$177,695,485
7	Total T & D Improvements	\$78,578,816	\$192,210,981	\$65,209,903	\$11,652,007	\$347,651,706	\$20,252,705	\$367,904,411	\$40,634,578	\$408,538,989

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Duke Energy Indiana - T & D Infrastructure Improvement Plan										
6 Year Detailed Summary By Year										
Distribution System Improvements										
Line No.	Project Category	2026 Material	2026 Labor	2026 Indirects	2026 AFUDC	2026 Total Capital Additions	2026 O&M	2026 Capital and O&M	2026 Retirements	2026 Total Project
1	Distribution System Circuit Improvements	\$37,015,298	\$54,287,933	\$30,841,467	\$3,986,586	\$126,131,284	\$17,941,286	\$144,072,570	\$27,899,702	\$171,972,272
2	Distribution System Substation Improvements	\$13,952,670	\$19,131,397	\$6,245,354	\$1,201,980	\$40,531,401	\$0	\$40,531,401	\$1,825,252	\$42,356,653
3	Total Distribution Improvements	\$50,967,968	\$73,419,330	\$37,086,821	\$5,188,566	\$166,662,685	\$17,941,286	\$184,603,971	\$29,724,954	\$214,328,925
Transmission System Improvements										
4	Transmission System Line Improvements	\$6,750,653	\$71,930,140	\$24,892,902	\$3,434,737	\$107,008,432	\$3,097,939	\$110,106,371	\$11,450,880	\$121,557,252
5	Transmission System Substation Improvements	\$13,960,263	\$17,010,487	\$5,943,877	\$1,328,205	\$38,242,832	\$0	\$38,242,832	\$1,603,854	\$39,846,686
6	Total Transmission Improvements	\$20,710,916	\$88,940,627	\$30,836,779	\$4,762,942	\$145,251,264	\$3,097,939	\$148,349,203	\$13,054,734	\$161,403,937
7	Total T & D Improvements	\$71,678,884	\$162,359,957	\$67,923,600	\$9,951,508	\$311,913,949	\$21,039,225	\$332,953,174	\$42,779,688	\$375,732,862

ATTACHMENT 1

Duke Energy Indiana - T & D Infrastructure Improvement Plan										
6 Year Detailed Summary By Year										
Distribution System Improvements										
Line No.	Project Category	2027 Material	2027 Labor	2027 Indirects	2027 AFUDC	2027 Total Capital Additions	2027 O&M	2027 Capital and O&M	2027 Retirements	2027 Total Project
1	Distribution System Circuit Improvements	\$35,559,859	\$59,413,169	\$33,126,208	\$4,319,744	\$132,418,981	\$19,685,394	\$152,104,375	\$32,467,153	\$184,571,528
2	Distribution System Substation Improvements	\$6,462,560	\$10,166,928	\$3,323,352	\$958,272	\$20,911,112	\$0	\$20,911,112	\$870,902	\$21,782,014
3	Total Distribution Improvements	\$42,022,420	\$69,580,097	\$36,449,560	\$5,278,016	\$153,330,092	\$19,685,394	\$173,015,487	\$33,338,055	\$206,353,542
Transmission System Improvements										
4	Transmission System Line Improvements	\$4,730,528	\$57,755,763	\$20,686,112	\$2,465,910	\$85,638,312	\$7,895,606	\$93,533,918	\$9,561,994	\$103,095,912
5	Transmission System Substation Improvements	\$8,580,200	\$13,055,961	\$3,843,439	\$883,902	\$26,363,501	\$0	\$26,363,501	\$1,622,803	\$27,986,304
6	Total Transmission Improvements	\$13,310,727	\$70,811,723	\$24,529,551	\$3,349,811	\$112,001,813	\$7,895,606	\$119,897,419	\$11,184,797	\$131,082,217
7	Total T & D Improvements	\$55,333,147	\$140,391,820	\$60,979,110	\$8,627,828	\$265,331,906	\$27,581,001	\$292,912,906	\$44,522,852	\$337,435,758

ATTACHMENT 1

PETITIONER'S EXHIBIT 2-A (JKL)  
DEI TDSIC 2.0  
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Duke Energy Indiana - T & D Infrastructure Improvement Plan  
6 Year Detailed Summary By Year  
Distribution System Improvements

Line No.	Project Category	2028 Material	2028 Labor	2028 Indirects	2028 AFUDC	2028 Total Capital Additions	2028 O&M	2028 Capital and O&M	2028 Retirements	2028 Total Project
1	Distribution System Circuit Improvements	\$40,150,414	\$63,168,349	\$36,139,148	\$4,729,110	\$144,187,021	\$21,464,276	\$165,651,297	\$35,573,960	\$201,225,256
2	Distribution System Substation Improvements	\$5,399,879	\$7,109,073	\$2,252,107	\$458,085	\$15,219,145	\$0	\$15,219,145	\$761,310	\$15,980,455
3	Total Distribution Improvements	\$45,550,293	\$70,277,422	\$38,391,255	\$5,187,195	\$159,406,165	\$21,464,276	\$180,870,441	\$36,335,270	\$217,205,711
Transmission System Improvements										
4	Transmission System Line Improvements	\$1,225,822	\$47,830,418	\$16,235,784	\$1,730,930	\$67,022,954	\$2,388,862	\$66,911,816	\$6,575,512	\$73,487,328
5	Transmission System Substation Improvements	\$13,555,397	\$19,169,042	\$6,032,246	\$1,410,027	\$40,166,711	\$0	\$40,166,711	\$1,756,266	\$41,922,978
6	Total Transmission Improvements	\$14,781,219	\$66,999,460	\$22,268,030	\$3,140,957	\$107,189,665	\$2,388,862	\$109,578,528	\$8,331,778	\$117,910,306
7	Total T & D Improvements	\$60,331,512	\$137,276,881	\$60,659,285	\$8,328,152	\$266,595,831	\$23,853,138	\$290,448,969	\$44,667,048	\$335,116,017

ATTACHMENT 1

Duke Energy Indiana - T & D Infrastructure Improvement Plan										
6 Year Detailed Summary By Year										
Distribution System Improvements										
Line No.	Project Category	6 Year Total Material	6 Year Total Labor	6 Year Total Indirects	6 Year Total AFUDC	6 Year Total Capital Additions	6 Year Total O&M	6 Year Total Capital and O&M	6 Year Total Retirements	6 Year Total Project
1	Distribution System Circuit Improvements	\$190,669,261	\$322,178,225	\$169,222,291	\$21,991,157	\$704,060,933	\$108,273,358	\$812,334,291	\$160,060,819	\$972,395,110
2	Distribution System Substation Improvements	\$57,813,347	\$84,409,831	\$27,610,529	\$7,131,799	\$176,965,506	\$41,837	\$177,007,344	\$9,998,648	\$187,005,992
3	Total Distribution Improvements	\$248,482,608	\$406,588,056	\$196,832,819	\$29,122,956	\$881,026,440	\$108,315,195	\$989,341,635	\$170,059,466	\$1,159,401,101
Transmission System Improvements										
4	Transmission System Line Improvements	\$53,531,606	\$325,577,475	\$101,085,130	\$14,467,837	\$494,662,048	\$22,610,931	\$517,272,980	\$51,650,177	\$566,423,156
5	Transmission System Substation Improvements	\$67,380,346	\$94,517,136	\$29,903,718	\$7,192,067	\$198,038,203	\$0	\$198,038,203	\$11,592,460	\$209,630,662
6	Total Transmission Improvements	\$120,911,952	\$420,094,611	\$130,988,849	\$21,659,904	\$692,700,251	\$22,610,931	\$715,311,182	\$63,242,636	\$776,053,819
7	Total T & D Improvements	\$369,394,560	\$826,682,667	\$327,821,668	\$50,782,860	\$1,573,726,691	\$130,926,126	\$1,704,652,817	\$233,302,103	\$1,935,454,920

## TDSIC 2.0 Economic Development River Ridge Site

11.18.21

### Project Scope Summary

#### M210394 - 138kV Switching Station

##### Preliminary additions:

- New 138kV 6 position ring bus with 6 breakers.
- Associated 138kV control building, equipment and relays.
- New switch station provides two 138kV positions in the station to feed new facility.
- It is assumed that the new switch station will be adjacent the existing 13857 line.
- Loop F13857 through station

#### M210394 - 138kV Line rebuild

- Rebuild F13898 from Jeffersonville to Speed and the Duke Owned portion of 13882 with 954 ACSS at 200°C.
- Approximately 15 miles of 138kV T-Line will need rebuilt.

### Project Class 4 Estimate Summary

Funding ProjectNumber	Description	Material	Labor	Indirects	Capex Total
M210394	138kV Switching Station				
M210394	138kV Line Rebuild				
Total		\$ 12,131,591	\$ 26,254,059	\$ 5,757,847	\$ 44,143,497

## VERIFICATION

I hereby verify under the penalties of perjury that the foregoing representations are true to the best of my knowledge, information and belief.

Signed: 

Erin Schneider

Dated: December 3, 2021