STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC SERVICE COMPANY FOR AUTHORITY TO MODIFY ITS RATES AND CHARGES FOR ELECTRIC UTILITY SERVICE AND FOR APPROVAL OF: (1) CHANGES TO ITS ELECTRIC SERVICE TARIFF INCLUDING A NEW SCHEDULE OF RATES AND CHARGES AND CHANGES TO THE GENERAL RULES AND REGULATIONS AND CERTAIN RIDERS; (2) REVISED DEPRECIATION ACCRUAL RATES; (3) INCLUSION IN ITS BASIC RATES AND CHARGES OF THE COSTS ASSOCIATED WITH CERTAIN PREVIOUSLY APPROVED QUALIFIED POLLUTION CONTROL PROPERTY, CLEAN COAL TECHNOLOGY, CLEAN ENERGY PROJECTS AND FEDERALLY MANDATED COMPLIANCE PROJECTS; AND (4) ACCOUNTING RELIEF TO ALLOW NIPSCO TO DEFER, AS A REGULATORY ASSET OR LIABILITY, CERTAIN COSTS FOR RECOVERY IN A FUTURE PROCEEDING.	)	**CAUSE NO. 44688**

COMPLIANCE FILING
PERFORMANCE METRIC COLLABORATIVE UPDATE

Ordering Paragraph 10 of the Indiana Utility Regulatory Commission's July 18, 2016 Order issued in this Cause ("Rate Case Order") directed Northern Indiana Public Service Company LLC ("NIPSCO") to participate in a collaborative for the purpose of implementing performance metrics. The Commission ordered that

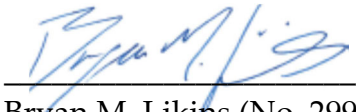
NIPSCO shall keep the Commission apprised of the progress of the collaborative through compliance filings made under this Cause as described in its Order as follows:

> [W]e find that NIPSCO shall facilitate a meeting with interested stakeholders within six weeks of the effective date of the Order in this Cause to collaborate on a path for moving forward with a performance metrics initiative.
>
> * * *
>
> In order that the Commission and interested stakeholders may stay abreast of the collaborative process, we direct NIPSCO to make a progress update filing with the Commission within 90 days of the initial meeting of the collaborative. We also order NIPSCO to file quarterly reports for the first year and an annual report by July 1, 2017, and for each year thereafter until otherwise indicated by the Presiding Officers.

Attached please find NIPSCO's Performance Metric Collaborative Report dated July 1, 2021, which incorporates revisions and language as provided by the interested stakeholders participating in NIPSCO's Performance Metrics Collaborative.

NIPSCO will file an annual Performance Metrics Collaborative Report for each year hereafter until otherwise indicated by the Presiding Officers.

Respectfully submitted:



Bryan M. Likins (No. 29996-49)
NiSource Corporate Services - Legal
150 West Market Street, Suite 600
Indianapolis, Indiana 46204
Phone: (317) 684-4922
Fax: (317) 684-4918
Email: blikins@nisource.com

Attorney for Petitioner
Northern Indiana Public Service Company LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served by email transmission upon the following:

OUCC
William Fine
Office of Utility Consumer Counselor
115 W. Washington Street
Suite 1500 South
Indianapolis, Indiana 46204
wfine@oucc.in.gov
infomgt@oucc.in.gov

NIPSCO INDUSTRIAL GROUP
Bette J. Dodd
Todd A. Richardson
Jennifer W. Terry
Tabitha L. Balzer
Lewis & Kappes, P.C.
One American Square, Suite 2500
Indianapolis, Indiana 46282
bdodd@lewis-kappes.com
trichardson@lewis-kappes.com
jterry@lewis-kappes.com
tbalzer@lewis-kappes.com

U.S. STEEL
Nikki G. Shoultz
Bose McKinney & Evans LLP
111 Monument Circle, Suite 2700
Indianapolis, Indiana 46204
nshoultz@boselaw.com

CITIZENS ACTION COALITION
Jennifer A. Washburn
Citizens Action Coalition
603 East Washington Street, Suite 502
Indianapolis, Indiana 46204
jwashburn@citact.org

INDIANA MUNICIPAL UTILITY GROUP
Robert M. Glennon
Robert Glennon & Assoc., P.C.
3697 N. Co. Rd. 500 E
Danville, Indiana 46122
glennon@iquest.net

UNITED STEELWORKERS
Antonia Domingo
United Steelworkers
60 Boulevard of the Allies, 8th Floor
Pittsburgh, Pennsylvania 15208
adomingo@usw.org

NLMK INDIANA
Anne E. Becker
Lewis & Kappes, P.C.
One American Square, Suite 2500
Indianapolis, Indiana 46282
abecker@lewis-kappes.com

James W. Brew
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson St., N.W.
8th Floor, West Tower
Washington, DC 20007
jbrew@smxblaw.com

WALMART
Eric E. Kinder
Spilman Thomas & Battle, PLLC
300 Kanawha Boulevard, East
P.O. Box 273
Charleston, West Virginia 25321
ekinder@spilmanlaw.com

Barry A. Naum
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, Pennsylvania 17050
bnaum@spilmanlaw.com

Carrie M. Harris
Spilman Thomas & Battle, PLLC
310 First Street, Suite 1100
P.O. Box 90
Roanoke, Virginia 24002-0090
charris@spilmanlaw.com

LAPORTE COUNTY
Shaw R. Friedman
Friedman & Associates, P.C.
705 Lincolnway
LaPorte, Indiana 46350
Sfriedman.associates@frontier.com

Keith L. Beall
Beall & Beall
13238 Snow Owl Dr., Ste. A
Carmel, Indiana 46033
kbeall@indy.rr.com
kbeall@clarkquinnlaw.com

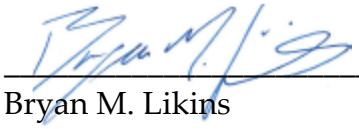
PRAXAIR
Timothy L. Stewart
Lewis & Kappes, P.C.
One American Square, Suite 2500
Indianapolis, Indiana 46282-0003
tstewart@lewis-kappes.com

ELPC
Jennifer A. Washburn
Citizens Action Coalition
603 East Washington Street, Suite 502
Indianapolis, Indiana 46204
jwashburn@citact.org

Bradley Klein
Environmental Law & Policy Center
35 E Wacker Drive, Suite 1600
Chicago, Illinois 60601
bklein@elpc.org

Robert Kelter
Environmental Law & Policy Center
35 E Wacker Drive, Suite 1600
Chicago, Illinois 60601
rkelter@elpc.org

Dated this 1st day of July, 2021.



Bryan M. Likins

July 1, 2021

Via Electronic Filing
Honorable James F. Huston
Chair
Indiana Utility Regulatory Commission
101 West Washington Street
Suite 1500 East
Indianapolis, Indiana 46204

RE: Cause No. 44688; Compliance Filing – Performance Metric Collaborative Update

Dear Chair Huston:

Enclosed please find the 2021 Performance Metric Collaborative Report prepared by Northern Indiana Public Service Company LLC ("NIPSCO"). As in previous years, NIPSCO provided the stakeholders involved in Cause No. 44688 with the opportunity to review and comment on the document, but the information was compiled by NIPSCO. The first two pages of the report provide an overview of the 2020 results and the appendix includes the data utilized in developing the graphs.

NIPSCO appreciates the participation of the stakeholders, particularly during the June 22, 2021 meeting to review the 2020 results. Please contact me if you have any questions or concerns.

Sincerely,

Erin E. Whitehead
Vice President, Regulatory and Major Accounts

Encl.
cc: (w/ encl. – via email transmission) to Service List in Cause No. 44688

PERFORMANCE METRIC REPORT

2020

Northern Indiana Public Service Company LLC

July 1, 2021

Performance Metric Report

Executive Summary 1

Updates in 2020 3

Safety 4

Reliability 9

Customer Service 16

Investment & Spending 20

Affordability 26

Staffing 30

Conclusion 32

Data Appendices

EXECUTIVE SUMMARY

This document is the fifth performance metric report Northern Indiana Public Service Company LLC (NIPSCO) has submitted to the Indiana Utility Regulatory Commission (Commission or IURC) in compliance with the Commission's July 18, 2016 Order in Cause No. 44688. The purpose of this report is to communicate NIPSCO's performance in areas such as safety, reliability, customer service, and operations in 2020. This submission contains the same data sets used in the prior reports and expands on these to enable interested stakeholders, the Commission, and NIPSCO, to understand and utilize key metrics. NIPSCO strives to deliver customer value in a balanced manner across four key dimensions – safety, customer experience, being a great place to work, and affordability. The year 2020 was unique given the COVID-19 pandemic and many of the metrics reflect the challenges faced by NIPSCO. In addition, the implementation of Rate 831on January 1, 2020 impacted various metrics.

Safety. During 2020, NIPSCO saw a sharp reduction in preventable vehicle crashes from 2019 and the Company was in the first quartile for vehicle safety nationwide. In addition, NIPSCO furthered its efforts to protect its employees, contractors, customers, and communities through the continued use of the Safety Management System (SMS) for its gas business and began the roll-out of SMS for its electric business. Although started as a gas initiative, all employees have been trained in and adopted the principles of this System, adding rigor to work processes and helping NIPSCO address risks before they become issues. The electric SMS initiative will be fully implemented in 2021. NIPSCO's underground damages increased in 2020, likely as a result of more customers pursuing home improvement projects during the COVID-19 pandemic.

Reliability. NIPSCO has seen benefits from its focus on improving reliability. There was a decrease in severe weather in 2020. Considering reliability metrics from an all-inclusive perspective (including major event days), NIPSCO has demonstrated long-term improvement in its reliability indices from a high in 2014. The Company's focus on vegetation management resulted in a reduction of tree-related outages.

Customer Service. NIPSCO continues to enjoy relative stability with the transactional customer satisfaction score. Noteworthy this year, J.D. Power scores for residential electric customer satisfaction again reflected a new high score for the Company. Only 38 IURC complaints were filed by customers in 2020, with one of those being substantiated. This is the lowest number of complaints filed with the IURC since NIPSCO began collecting metrics for this report.

Investment and Spending. NIPSCO reduced operational O&M costs in many areas in 2020 with total O&M costs decreasing by over $160 million. Current benchmarking results reflect this reduction in costs, despite a decline in total retail sales, and an increase in the number of retail customers. Due to continuous improvement efforts at both NiSource and NIPSCO, the Company continues to drive down costs per retail customer and costs per MWh. NIPSCO saw a reduction in sales in 2020, likely driven by a combination of the removal of sales due to the implementation of Rate 831as well as reduced load due to COVID-19-driven shut downs of commercial and industrial customers.

Affordability. The COVID-19 pandemic had a significant impact on the number of disconnections due to the five-month disconnection moratorium. NIPSCO continued to see a

positive trend regarding the use of its program that allows for customers to make payments over the telephone while the technician is on-site to complete the disconnection, thereby providing a final opportunity to avoid disconnection. However, it should be noted that the metric is artificially low due to the moratorium. Both the number of mailed notices regarding disconnections for non-payment and the number of actual disconnections for non-payment again decreased in 2020, but, again, much of this decline is due to the disconnection moratorium.

NIPSCO is committed to continuous improvement of its various processes. NIPSCO looks forward to continued improvement in 2021.

UPDATES IN 2020

COVID-19 Pandemic Response

Beginning on March 16, 2020, NIPSCO activated its Incident Command System (ICS) to address risks associated with COVID-19 and its potential impact on NIPSCO's operations and to limit, to the extent possible, exposure to the coronavirus by our customers and workforce. The ICS structure is focused on an ongoing assessment of risks and the implementation of proactive steps appropriate to address and limit the impact they pose. NIPSCO's leadership and workforce were trained on the activation and operation of the ICS structure beginning in early 2019 in anticipation of the need to quickly and efficiently react to critical challenges that could arise. NIPSCO has experienced twelve work-related, OSHA Reportable COVID-19 cases from the start of its pandemic response.

Although not inclusive of all actions taken, key preliminary actions taken to reduce exposure included, transitioning employees to working at home, or reporting from home, maximizing social distancing by staggering shifts/using multiple reporting locations, reduction in work requiring home entry, additional personal protective equipment requirements for entering customer premises when necessary, limiting non-essential field activities, focusing on capital and compliance related work, eliminating in-person meetings and using of video conferencing, retention of third party vendors to perform deep cleaning of facilities and vehicles as required, introduction of required temperature checks prior to entry into select company facilities, introduction of COVID-19 testing for employees suspected of exposure, and introduction of sequestration for limited critical function employees including pre-sequestration COVID-19 testing. The pandemic likely impacted a number of metrics and those effects are discussed throughout the report.

Introduction of Rate 831

On January 1, 2020, NIPSCO implemented its new base rates including the introduction of a new industrial rate structure. NIPSCO's Electric Rate 831, Industrial Power Service – Large is available to Industrial Customers taking service at Transmission (> 69,000 volts) or Subtransmission voltage (34,500 volts). Customers shall contract for a definite amount of electrical demand which shall not be less than 10,000 kW. Rate 831 offers aggregation of premises held under common ownership and having the same qualifying service voltage.

Rate 831 offers three Tiers of service.

–Tier 1: Firm (NIPSCO supplied)

–Tier 2: Non-firm market price (market supplied)

–Tier 3: Non-firm 3rd Party generation (generator/marketer or market supplied)

Tier 1 is traditional firm utility service. The default Tier 1 Contract Demand is 30,000 kW with an option to elect above or below the default amount down to 10,000 kW. Tier 1 has a Demand

Charge. Tier 1 firm energy is calculated on an hourly basis and is subject to Tier 1 energy charges, transmission charges and applicable Riders.

Tier 2 allows the option of 24/365 MISO Day Ahead locational marginal prices (LMPs). Tier 2 is curtailable unless the customer firms up capacity. Energy is calculated on an hourly basis and is subject to transmission charges and applicable Riders.

Tier 3 allows customer to bid their own load within MISO as Day Ahead or Real Time LMP. Customers can also arrange for third party energy and capacity. Tier 3 Energy is subject to transmission charges.

Rate 831 reduced NIPSCO's sales volumes, which impacts a variety of metrics. Those impacts are addressed throughout the report. However, with only one year of experience with the new rate structure, and the additional layer of the COVID-19 pandemic, it is not completely clear what the long-term impacts of the new rate structure will be. NIPSCO will continue to monitor the various metrics and is committed to working with stakeholders on the best way to illustrate Rate 831 and its influence on the various metrics.

SAFETY

Safety is a core value of the NIPSCO organization. The Company's safety policies reflect a "just culture" mindset, which is a model used by high consequence industries to improve the way they approach system safety and staff accountability.

Organizations foster a just culture by looking first at systematic issues rather than individual performance. This approach recognizes that all employees err, and therefore a company should design its systems and procedures so that when an error occurs, injuries are limited due to multiple layers of protection. This is the "Fail Safely" approach incorporated by the Company.

NIPSCO employees have increasingly embraced safety initiatives through the past few years. Three metrics used by the Company to measure its safety efforts are discussed below.

Vehicle Safety

Due to the COVID-19 Pandemic, several training requirements were reviewed and revised in consideration of employee safety and company policy. This included prohibiting more than one employee per vehicle. All employees authorized to operate company vehicles must complete a Smith System defensive driver training program. This program was adjusted to offer a virtual training solution for our employees. Also, all NIPSCO employees must pass multiple driving safety related computer-based learning modules each year.

In 2018, NIPSCO installed GreenRoad telematics in all of its fleet vehicles. This system gives real-time feedback to the driver when unsafe driving practices, such as hard braking or excessive speed, are detected and sends certain information regularly to the Company for corrective follow-up. This system allowed our supervisors the opportunity to coach to their employee's driving

behaviors, while still meeting the requirements of our pandemic protocols. NIPSCO will continue to make program adjustments to further increase the viability and sustainability of the telematics technology. In 2020, NIPSCO saw a 50% reduction in its preventable vehicle crash rate from 2019, which is likely due to less driving during the COVID-19 pandemic, as well as the use of telematics technology and other safety initiatives.

Figure 1. Preventable vehicle crash rate

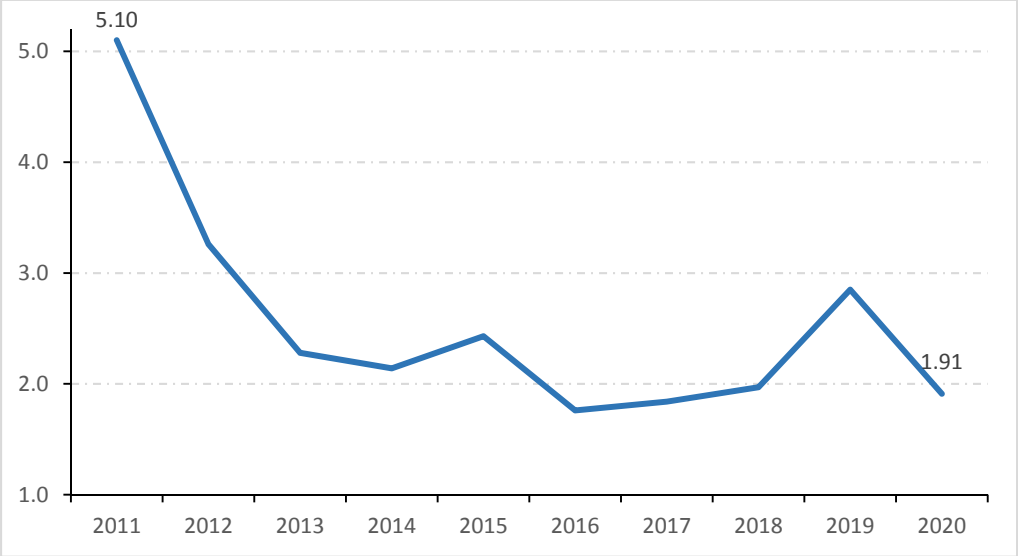


Figure 1 illustrates NIPSCO's *preventable vehicle crash rate*, which represents the number of crashes per one million miles driven in which any employee, while driving on Company business, failed to do everything reasonably possible to avoid a collision. This metric is combined for gas and electric. NIPSCO continues to focus on decreasing these accidents.

NIPSCO benchmarks this metric against American Gas Association (AGA) data for combination utilities. NIPSCO is in the first quartile in this category, which is an improvement over 2019 when the Company was in the second quartile.

Field Safety

NIPSCO strives to make safety a foremost priority for its employees every day. In the office, supervisors are encouraged to begin each meeting with a safety moment so that safe working practices become engrained in the Company's culture. Due to the pandemic, these types of meetings were either held virtually, or within spaces where essential workers could meet the requirements of our pandemic protocols. Field employees receive Human Performance Improvement (HPI) training, which includes emphasis on human error reduction tools such as pre-job briefing and Stop Work Authority. The Company is committed to ensuring our employees have a deeper understanding of human error and how to prevent it. HPI places an emphasis on understanding personal capabilities, assessing levels of risk, and controlling that risk through use

of layers of protection and error prevention techniques. Employees conduct a pre-job briefing before each work task. This includes the identification of unique site hazards, required personal protective equipment, energy control, and critical work procedures. Local management then reviews these analyses to follow up on any potential operating issues. NIPSCO has also developed and implemented a Stop Work policy, which promotes and empowers employees to stop work whenever they see an employee, business partner or member(s) of the public who is at risk of harm.

The *OSHA recordable incident rate* represents the number of recordable injury or illness cases for every 100 full-time employees. Most injuries or illnesses that require more than first aid treatment are recordable.

The *days away, restricted, or transferred (DART)* metric represents the number of injury and illness cases requiring days away, restricted duty, or job transfer for every 100 full-time employees. This number indicates the rate of injuries that result in an employee being unable to perform its typical job requirements.

Figure 2. Employee injuries – Generation and Power Delivery Divisions

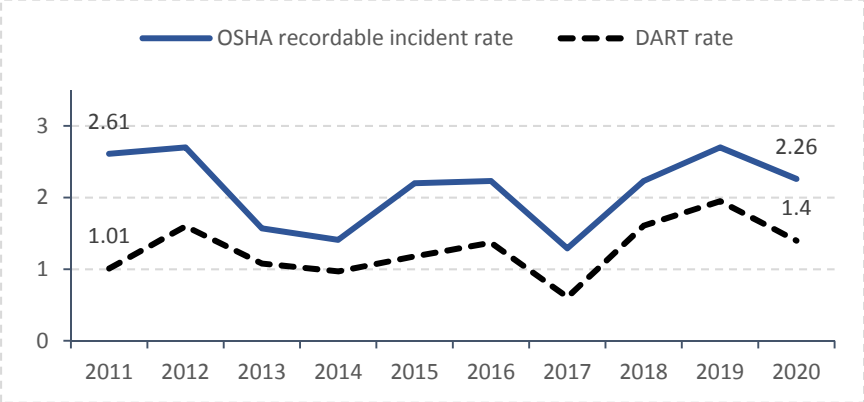


Figure 2 illustrates the two metrics NIPSCO uses to measure employee safety in the field for electric employees in the generation and power delivery divisions.

Figure 3. Employee injuries – NIPSCO with Business Service Allocation

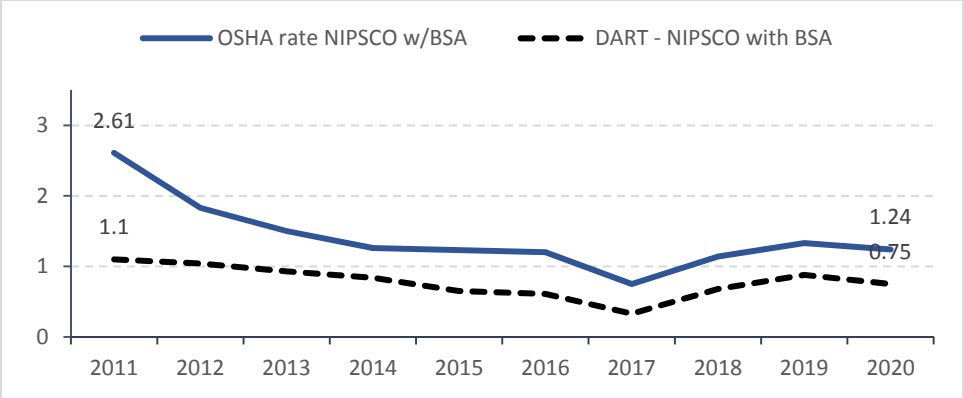


Figure 3 illustrates the two metrics NIPSCO uses to measure employee safety in the field for all NIPSCO employees.

NIPSCO continues to address issues related to safety, including the implementation of a Safety Management System, based on the American Petroleum Institute (API) Recommended Practice (RP) 1173. The Four (4) Core Responsibilities of SMS include, Following Our Processes and Procedures; Identifying and Reporting Risks; Continually Improving Processes and Procedures; Identifying and Proactively Taking Action. Our SMS is taking safety to a new level of continuous improvement. It brings together people, processes and culture to proactively find and act on risks to our employees, contractors, customers and communities. The Corrective Action Program (CAP) is a foundation of that effort. The Corrective Action Program offers a simple way to document identified risks and a systematic process to review, prioritize, address and track progress to reduce risks. Submitting an issue, concern or risk in the Corrective Action Program starts a rigorous process that can lead to resolving a prioritized risk through corrective action.

Figure 4. Underground damages per 1000 locates

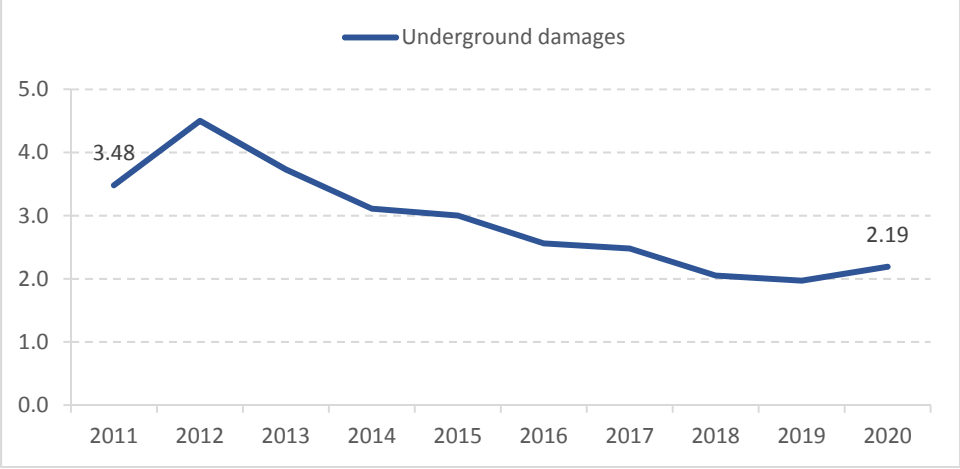


Figure 4 illustrates the *underground damages* metric represents the number of reported gas and electric damages divided by the number of locate tickets received through the 811 process multiplied by 1,000. NIPSCO reports this information to the federal Pipeline and Hazardous

Materials Safety Administration (PHMSA). Although the Company recorded an uptick in the number for 2020, likely caused by numerous home repairs pursued while people were home more during the pandemic, underground damages continue to be a major area of focus for NIPSCO.

RELIABILITY

Power Delivery

A *major event day* (MED) is a day on which a weather or operational event causes a utility's daily System Average Interruption Duration Index (SAIDI) to exceed a calculated threshold (TMED).[1] A single event may cause multiple MEDs, and power outages may remain for days after the event is over.

Figure 5. Major event day metrics

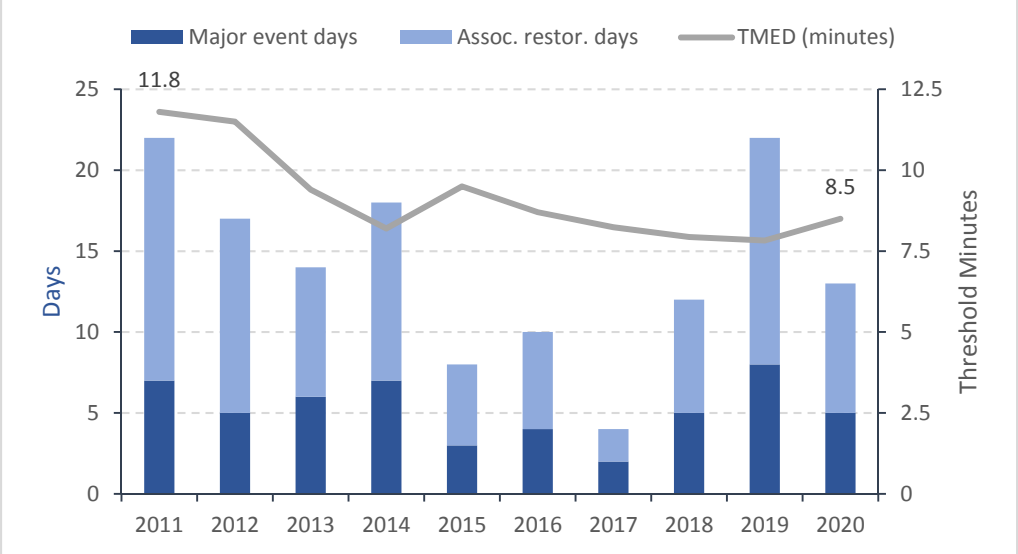


Figure 5 illustrates the number of MEDs in NIPSCO's service territory, the number of restoration days associated with those MEDs, and the TMED that was used to identify major event days each year.

The decrease in MEDs and associated restoration days in recent years is the result of fewer major storms and NIPSCO's vegetation management program. NIPSCO experienced a decrease in severe weather in 2020, with only five MEDs, which is about average for the past 10 years.

Since 2017, NIPSCO has steadily increased funding for its vegetation management program that specifically focus on trimming more circuit miles on distribution and subtransmission circuits. The majority of the increase in spending has been on circuits that have the highest tree-related outages. NIPSCO continues to strive for a five-year cycle; however, the Company has found that a vast majority of the priority circuits have had a higher tree density than originally anticipated. For this reason, along with a high demand for tree contractor labor, NIPSCO has been hampered in achieving a five-year cycle at this time. Despite not realizing a five-year cycle, NIPSCO has seen an overall decrease in tree-related outages. From 2015 to 2018, tree-related outages per year

[1] The TMED calculation is based on IEEE Standard 1366-2012. It uses a utility's daily SAIDI values for the past five reporting years.

were consistently around 3,500 outages. In 2019, the number dropped to around 3,000 outages, a 17% improvement and that the downward trend continued into 2020. There were 2,892 outages attributed to vegetation in 2020.

Utilities use three principal indices to measure service reliability.

SAIDI: represents the average outage duration of each electric customer served. In 2020, the average NIPSCO electric customer did not have electric service for 138 minutes due to reliability issues. NIPSCO's SAIDI has been below or slightly above the IEEE industry median for medium-sized utilities since 2014.

$$SAIDI = \frac{\sum customer\ outage\ minutes}{customers}$$

System Average Interruption Frequency Index (SAIFI): represents how many times per year the average customer experiences an interruption in electric supply. A customer must lose service for more than five minutes for the incident to be defined as an interruption. In 2020, the average NIPSCO electric customer experienced a power interruption .901 times. NIPSCO's SAIFI continues to be below (better than) the IEEE industry median for medium-sized utilities.

$$SAIFI = \frac{customer\ interruptions}{electric\ customers}$$

Customer Average Interruption Duration Index (CAIDI): represents the average length of outage for customers who experience an outage. CAIDI is therefore equal to SAIDI divided by SAIFI. In 2020, the average NIPSCO electric customer that experienced a power interruption had to wait 153 minutes before power was restored.

$$CAIDI = \frac{\sum customer\ outage\ minutes}{customer\ interruptions}$$

Figure 6. Reliability indices (including MED data)

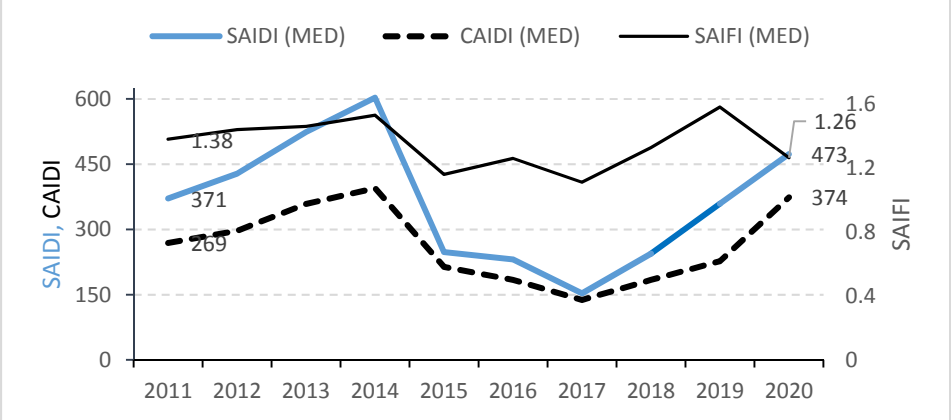


Figure 6 illustrates NIPSCO's three reliability indices using MED data.

By industry standard, reliability indices are reported without MEDs, which are primarily storms or severe weather events more destructive than typical storm events. The data that is excluded (called MED data) is identified by using TMED. If a utility's daily SAIDI exceeds the TMED, the outage data on that date will be excluded from the utility's non-MED reliability indices. NIPSCO experienced its worst storm (the derecho of August 10, 2020) in 10 years, which significantly affected SAIFI and CAIDI. The major storm impacted over 100K customers and spanned six days, two of which were classified as MED.

Figure 7. Reliability indices (excluding MED data)

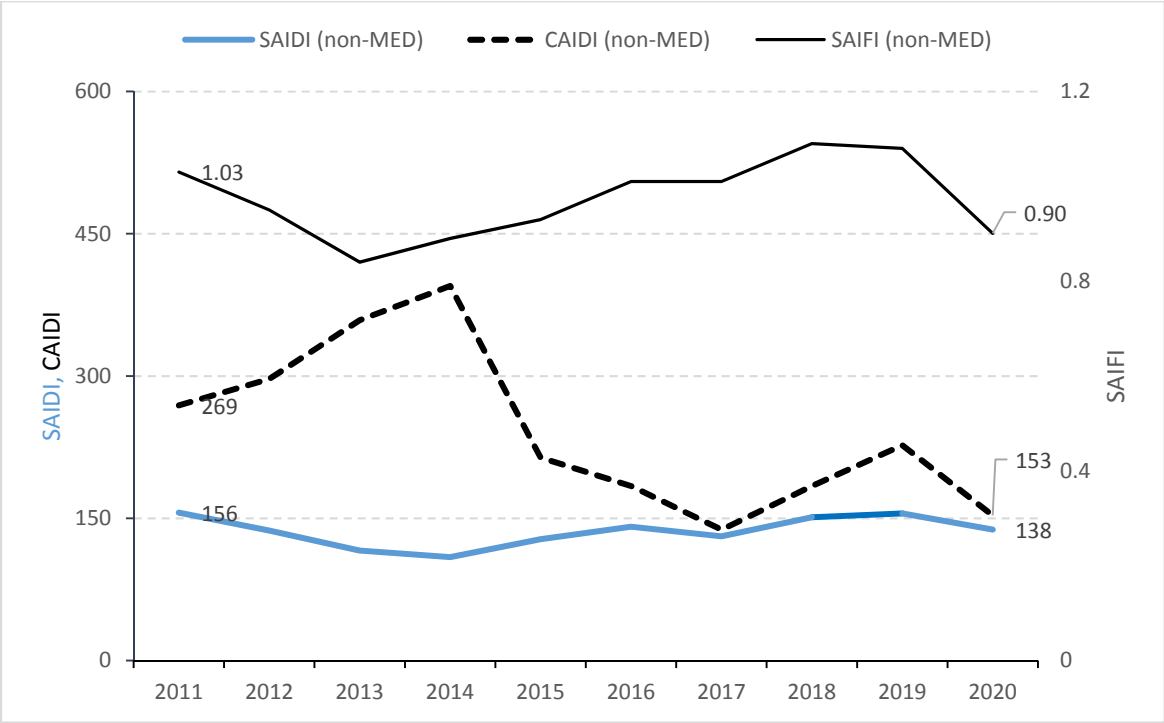


Figure 7 illustrates NIPSCO's three reliability indices excluding MED data.

NIPSCO's SAIFI performance has been below (better than) the IEEE industry median for medium-sized utilities for the past 10 years. NIPSCO's 2020 SAIFI performance represents IEEE industry first quartile performance for mid-size utilities.

In 2020, the average NIPSCO electric customer that experienced a power interruption waited 153 minutes for power restoration, an increase from 2019. The recent negative trend from 2019 to 2020 in CAIDI illustrated above, which excludes MED data, is primarily due to major storms, equipment failure, reduced system resiliency from planned outage work, and slowed response from extensive COVID-19 health and safety protocols implemented to protect the workforce (i.e. social distancing within field crews, single response vehicle use). However, NIPSCO continues to invest capital in its electric system to improve reliability, including the replacement of over 1,200 wood poles and 37 miles of underground distribution cable in 2020. In addition, NIPSCO also investigates all

outages affecting more than 1,000 customers and utilizes these lessons learned to improve construction standards, material selection, system configuration, and operating procedures.

In 2020, the average NIPSCO electric customer did not have electric service for 138 minutes, which is a 17 minute improvement from 2019 (where the average was 155 minutes) and NIPSCO's best performance since 2017. The execution of extensive planned outage work to replace aging infrastructure through NIPSCO's Transmission, Distribution, and Storage System Improvement Charge plan, affected approximately 54,000 more customers from abnormal system configuration. However, this represents a 46% reduction from 2019 following the implementation of an operational policy change in late 2019. The policy mandated contingency plans for high-risk circuits/projects that contains alternate switching plans, returning circuits to system normal daily, and deploying mobile substations to improve system resiliency and reduce customer impact. The 11% year over year improvement in NIPSCO's SAIDI performance produced an uptick in customer satisfaction for residential electric customers.

Power Generation

This report presents NIPSCO's generation productivity metrics by large generator type: coal and combined cycle natural gas. NIPSCO's coal units include those at the R.M. Schahfer Generating Station (Schahfer), Michigan City Generating Station (Michigan City), and Bailly Generating Station (Bailly), and the coal metrics shown are weighted by unit capacity. Bailly Units 7 and 8 were retired on May 31, 2018. Bailly is included in the generation productivity numbers through 2018, but is excluded beginning in 2019. Sugar Creek Generating Station (Sugar Creek) is the Company's combined cycle gas turbine plant. The two combustion turbines[2] are peaking units that are rarely used. Schahfer Units 14 and 15 were off-line beginning July 16, 2020 after a fire at Unit 14. Unit 15 came back on-line in 2020, but Unit 14 remains in forced outage and NIPSCO has announced plans to retire both units in 2021. Both units were included in the 2020 results.

Figure 8. Generation portfolio (MW)

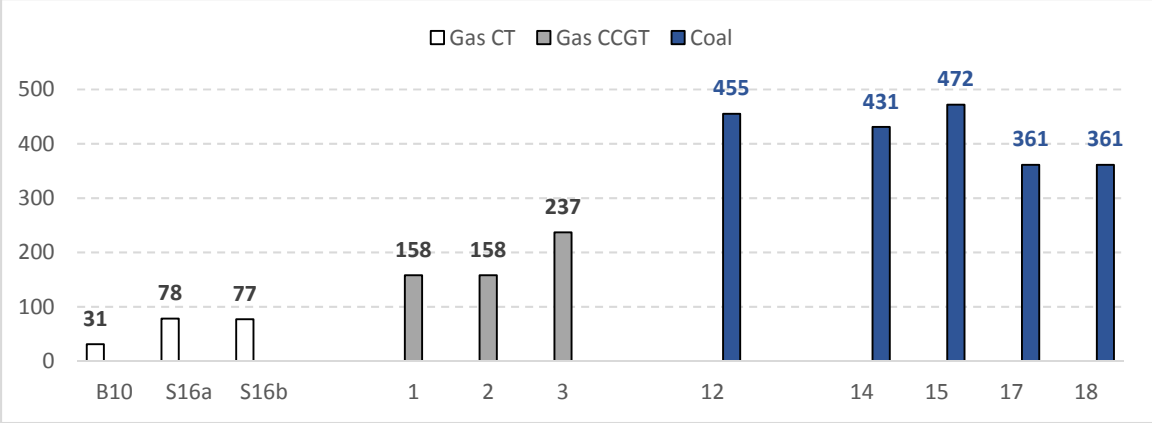


Figure 8 shows NIPSCO's current generation portfolio in megawatts.

[2] Unit 10 retired on July 15, 2020.

Figure 9. Equivalent availability factor

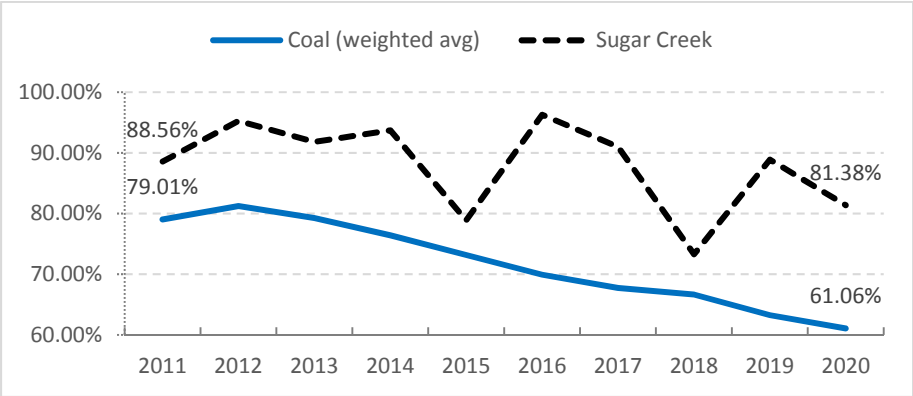


Figure 9 illustrates the *equivalent availability factors* (EAF) of NIPSCO's units.[3] This metric represents the percentage of time a unit was available to generate power. The "equivalent" part of the definition accounts for times in which the unit was derated, meaning it could generate power but not up to 100% of its potential.

Although Bailly was retired in the middle of the year, the 2018 numbers above include it for the entire year. When Bailly is removed, the EAF for the coal units is 71.62%. The EAF for 2019 does not include Bailly. In 2020, Units 12 and 17 had improved performance over 2019. The decrease in 2020 was largely due to the unavailability of Units 14 and 15 as discussed above.

A unit's *equivalent forced outage rate* (EFOR) represents the percentage of time (in hours) the unit was unable to generate power for reasons other than planned maintenance.

$$EFOR = \frac{FO + EFD}{FO + S + EFDRS} \times 100\%$$

These reasons include forced outages (FO) or equivalent forced derates (EFD), which occur if a unit is unable to produce 100% of its typical capacity. The denominator in the equation is the sum of forced outage hours, service hours, and equivalent forced derates when the unit is in reserve shutdown.

[3] EAF = [(Available Hours – Equiv. Planned Derate Hours – Equiv. Unplanned Derate Hours) / Period Hours] × 100%

Figure 10. EFOR

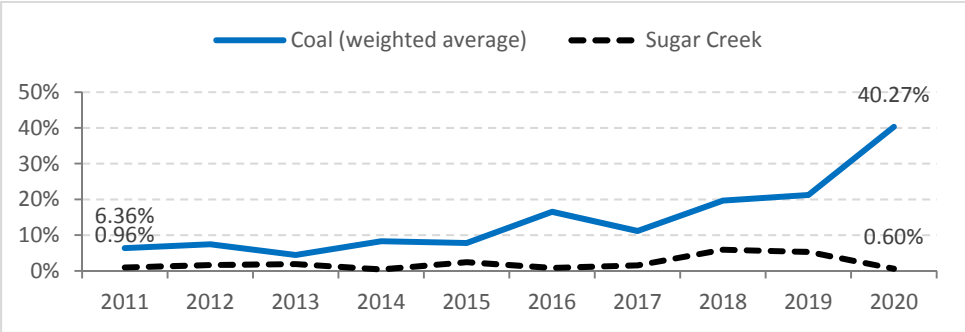


Figure 10 illustrates NIPSCO's EFOR during the period. Although Bailly was retired in the middle of the year, the 2018 numbers above include it for the entire year. When Bailly is removed, the EFOR for the coal units is 16.87%. The EFOR for 2019 does not include Bailly.

NIPSCO's coal EFOR has been significantly affected by the changing power markets, which has economically dispatched coal units less frequently. When coal units are selected less often to generate power, the units must be started and stopped more often. This infrequent operation imposes high thermal stresses on a unit leading to an increase in forced and maintenance outage hours or lower availability. It also resulted in more unit reserve hours (fewer service hours) in 2019 than 2018. In addition, both Units 14 and 15 had high EFOR because of the extended outage for both units following the fire at Unit 14, which is the primary reason for the increase in 2020.

Figure 11. Coal generation

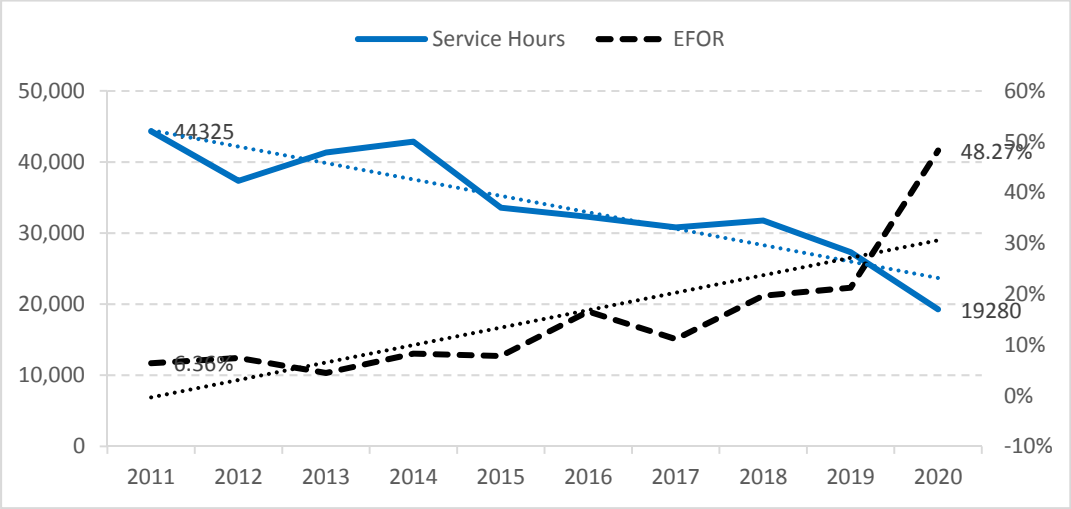


Figure 11 illustrates the relationship between the total service hours of NIPSCO's coal generation and the EFOR of those units. In 2020, in addition to the long outages at Units 14 and 15, the coal service hours were slightly lower than 2019 because of economics, as the coal-fired units were not dispatched as often under Midcontinent Independent System Operator, Inc.'s (MISO) security-constrained economic dispatching practices. The lower service hours directly impacts EFOR as explained above.

Figure 12. Net capacity factor[4]

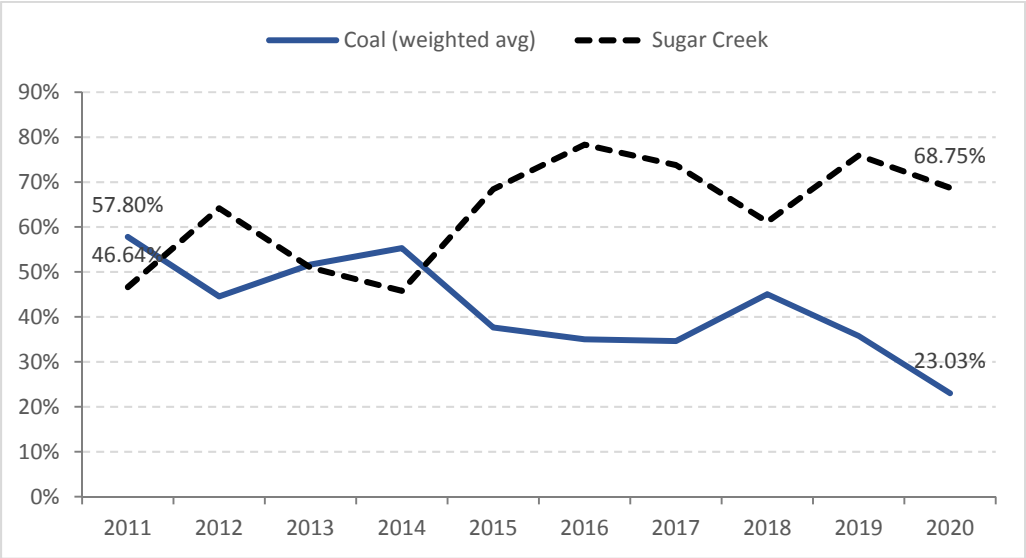


Figure 12 illustrates the *net capacity factor* (NCF) of NIPSCO's units. This metric represents the percentage of a unit's full capacity that it is allowed to produce on average during the period.

Net capacity factor is a function of a unit's availability and its variable operating costs. A unit that has frequent forced or planned outages, or high operating costs compared to other generating units, will have a lower capacity factor. A unit's NCF is affected by the amount of time it is available to run but has not been selected due to economics. A unit that is always available to generate and has competitive operating costs will have a higher capacity factor. This largely explains why NIPSCO's gas-fired units at Sugar Creek have a much higher NCF than its coal-fired units. As discussed with other metrics, the long forced outages at Units 14 and 15 impacted both their NCF, as well as the overall NCF for the coal units in 2020.

[4] Generating units continue to consume a small amount of power even when they are not generating energy. This auxiliary power is subtracted from a unit's generation total and decreases the unit's NCF.

CUSTOMER SERVICE

Customer Service

NIPSCO's highest priority is the delivery of safe, reliable service for customers. NIPSCO values its ability to quickly respond to the needs of its customers in the communities it serves across northern Indiana. The Company regularly benchmarks and measures the success of its customer service efforts in order to continually improve on processes and scores.

Figure 13. Call center operations

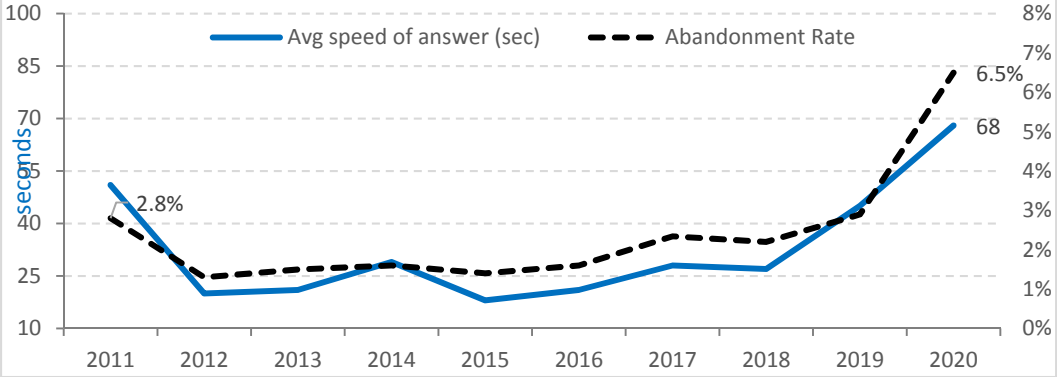


Figure 13 shows the average speed of answer and the abandonment rate.

The *average speed of answer* metric represents the average number of seconds a caller waits before his or her call is answered by a Customer Service Representative, exclusive of the time a caller is navigating through the interactive voice response phone system.

The *abandonment rate* represents the percentage of telephone calls made to NIPSCO that are abandoned by the customer before speaking with a Customer Service Representative. The call center telephone system informs customers of their estimated wait time and gives them the option to receive a "virtual callback," in which the Virtual Hold technology auto dials the customer, in the order that the customer called, when a Customer Service Representative is available for the next caller. The metrics shown in Figure 13 are both indirectly related to the two metrics discussed below. The slight uptick in both metrics increased emphasis on staff training and new payment options for customers, including making a payment by telephone in lieu of disconnection while the crew is at the home to perform the disconnection. These new payment options provide benefits for customers, but take longer to process. In addition, COVID-19 had an impact on both metrics because of the increased need for payment plans and to discuss other customer questions and concerns.

Figure 14. Employee efficiency

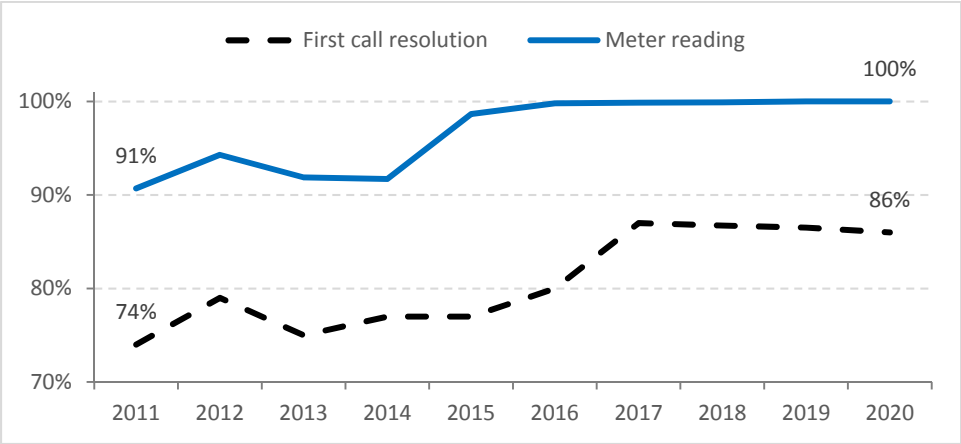


Figure 14 shows first call resolution and the meter reading rate.

The *first call resolution* metric is measured by an outside vendor and represents how often NIPSCO is able to meet a customer's needs during the first telephone call. Customers highly value the ability of NIPSCO to resolve their issues quickly. NIPSCO continues to be in the high 80% range for this metric.

The *meter reading metric* represents the percentage of NIPSCO's residential and commercial electric meters that the Company accurately reads each month. The rollout of the Company's automated meter reader program in 2015 and 2016 accounts for the significant improvements in that period.

Customer Satisfaction

Figure 15. Customer satisfaction score

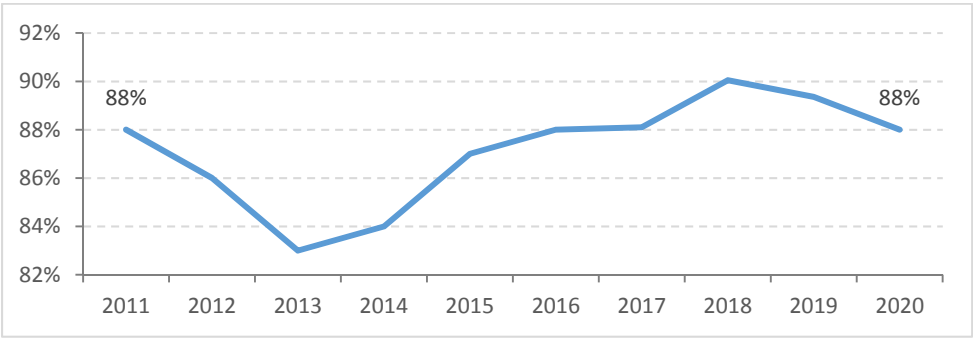


Figure 15 is the customer satisfaction score. NIPSCO engages a third party to measure how well the Company interacts with its customers. The *customer satisfaction (CSAT) score* reflects the average customer's experience when the customer interacts with (1) a Customer Service

Representative on the telephone; (2) the interactive voice response telephone system; (3) an employee on the customer's property; or (4) NIPSCO's self-service website.

Prior to 2015, the CSAT score primarily reflected customers' interactions with NIPSCO's call center, and customers were only asked a single question. The Company modified its satisfaction survey that year to better measure its performance in discreet channels, and weighted each channel's score according to the number of surveys completed for that channel. NIPSCO has found that measuring customer satisfaction in different channels better identifies successful practices and opportunities for improvement.

In 2017, NIPSCO hired a new vendor and made three significant changes to determining the CSAT score. First, customers were allowed to complete online surveys. All surveys had previously been conducted over the telephone. Second, NIPSCO began weighting each communication channel equally in the CSAT score calculation. Third, the Company switched from quantitative responses (1-10) to qualitative responses (such as "I am somewhat satisfied"). For these reasons, NIPSCO uses the 2017 score as the new benchmark for this metric.

NIPSCO incorporated the residential gas and electric J.D. Power scores into its corporate incentive plan calculation in 2016 as part of its commitment to customer service. The Company incorporated the CSAT score into that calculation the following year. Despite the challenges presented by the COVID-19 pandemic, NIPSCO continues to have a high CSAT score, at 88% for the year.

Figure 16. J.D. Power scores

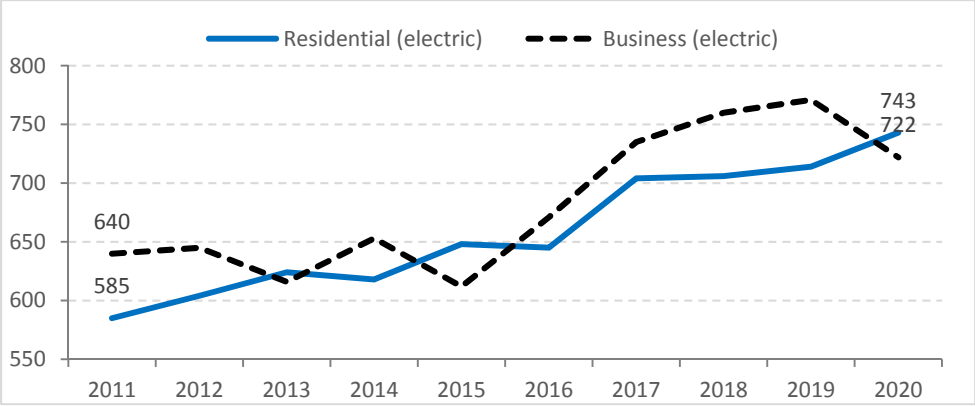


Figure 16 shows the J.D. Power Electric Utility scores for residential and business customers. The *J.D. Power Electric Utility Customer Satisfaction* studies examine residential and business customer satisfaction across six factors – power quality and reliability, price, billing and payment, communications, corporate citizenship, and customer service. In 2020, NIPSCO achieved its highest rating of 743 for overall customer satisfaction in the electric residential study. This score was a 29 point improvement over the year-end 2019 score of 714. For the first quarter of 2021, scores continue to show improvement with a rating of 754, which is three points above the industry average for this quarter. The decrease in the business score for 2020 is likely related to COVID-19 and the myriad of challenges faced by businesses.

Figure 17. IURC electric complaints

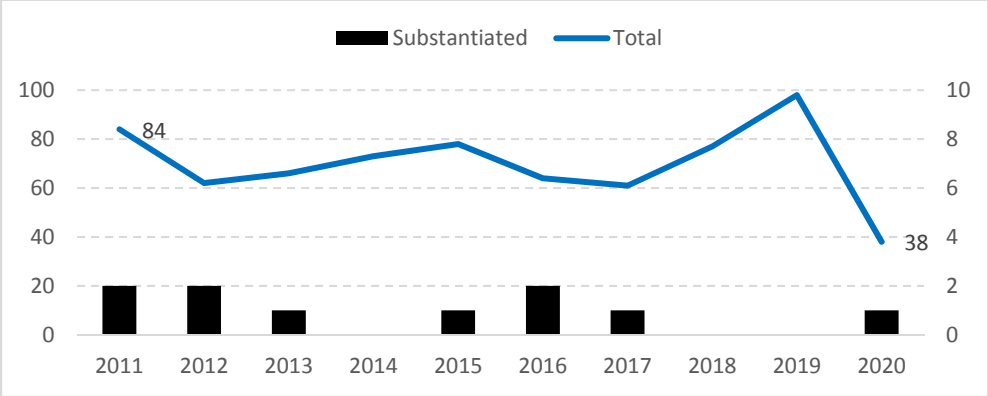


Figure 17 is the number of formal complaints filed with the Commission. Utility customers in Indiana may file a complaint with the Commission if they feel aggrieved. The Commission's Consumer Affairs Division investigates each complaint and determines whether the complaint is substantiated. Figure 17 illustrates the number of electric complaints filed with the Commission against NIPSCO and the number of complaints that uncovered a violation. In 2020, NIPSCO saw the fewest number of complaints since the metric has been tracked for this report, although one of the complaints was substantiated. While NIPSCO is pleased with the dramatic decrease in the number of complaints, it should be noted that a number of complaints each year are related to disconnections. Due to the disconnection moratorium in 2020 due to COVID-19, it is likely that the number of complaints related to disconnections, and therefore, total complaint numbers, will return to more normal levels in 2021.

INVESTMENT & SPENDING

This section analyzes NIPSCO's operations and maintenance (O&M) expense. The data is the same as the data included in NIPSCO's Federal Energy Regulatory Commission (FERC) Form 1.

The Electric O&M Expense section of the FERC Form 1 is divided into eight parts. Part 1 covers power production, which is divided into steam, nuclear, hydro, and other (gas). Parts 2-4 cover power delivery functions: transmission, regional market, and distribution. Parts 5-7 cover customer service, and Part 8 covers corporate administration.

In this report, megawatt hours (MWh) represent either retail sales (Figures 18, 25, 26 and 27), or total sales including sales for resale (Figures 20, 21, 22 and 23), with the legends marked accordingly. Figure 20 also expresses non-fuel production O&M expense as a function of MWh generated by the utility. The "non-fuel" numerators exclude Accounts 501 (steam fuel), 547 (other generation fuel), and 555 (purchased power). Figure 21 also expresses transmission O&M expense as a function of line miles. These accounts can be found on pages 320 and 321 of the Form 1.

Total O&M

Figure 18. O&M Expense per Retail MWh[5]

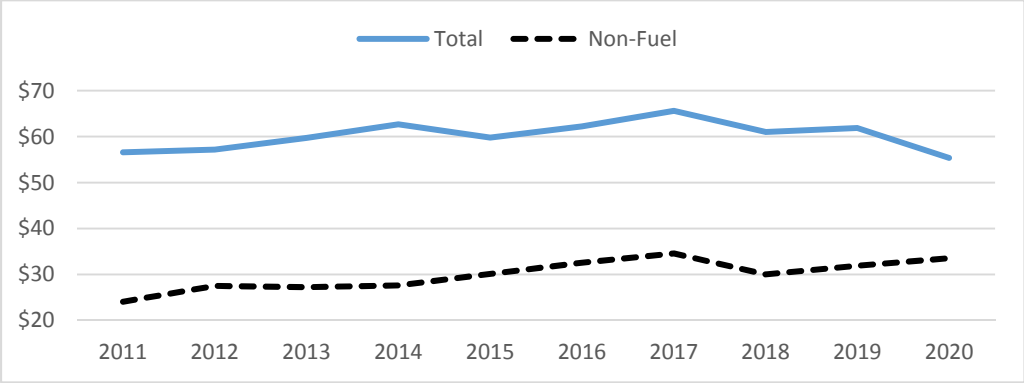


Figure 18 is the O&M expense per retail megawatt hour.

[5] Page 323, line 198 / Page 301, line 10 (d).

Figure 19. O&M Expense per Retail Customer[6]

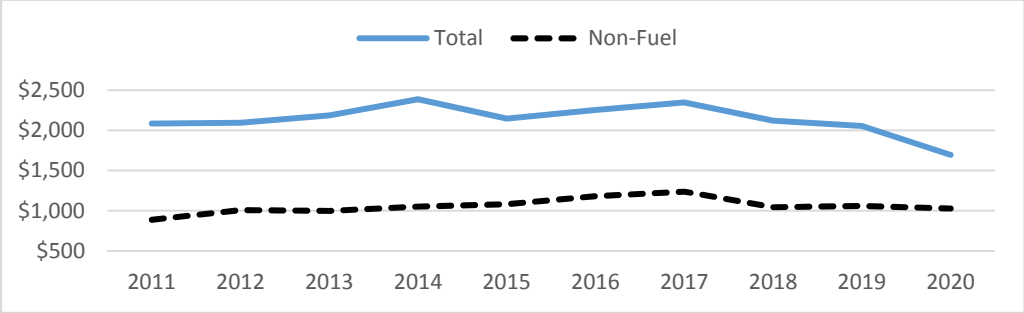


Figure 19 is the O&M expense per retail customer.

O&M Components

Figure 20. Non-fuel Production O&M Expense[7]

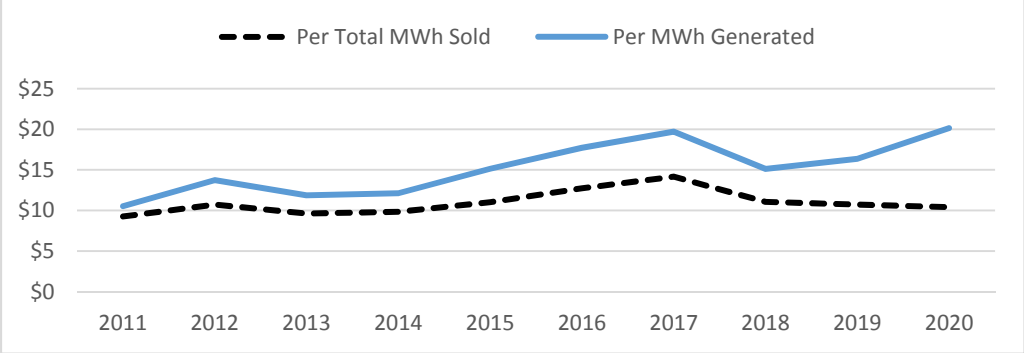


Figure 20 illustrates NIPSCO's non-fuel production O&M expense.

[6] Page 323, line 198 / Page 301, line 10 (f).
[7] Page 321, line 80– lines 5, 25, 63, and 76 / Page 301, line 12(d); per MWh generated uses Page 401a. line 9.

Figure 21. Transmission and Distribution O&M expense[8]

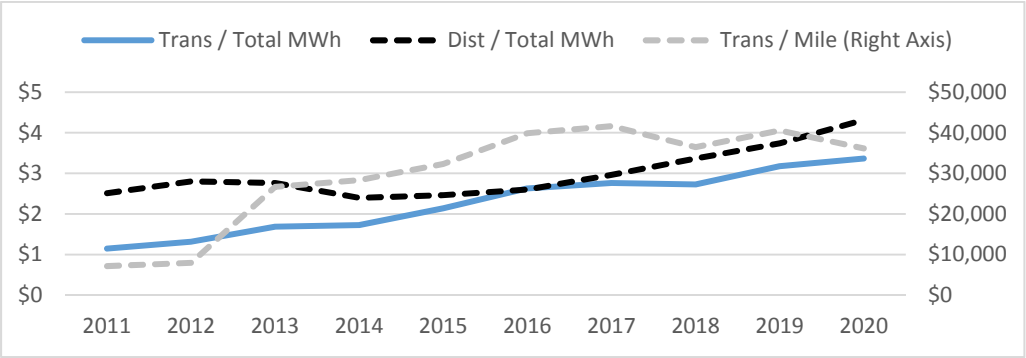


Figure 21 illustrates NIPSCO's transmission and distribution expenses as a function of total energy sales. It also shows transmission expenses as a function of line miles. In 2013, NIPSCO reclassified its 69 kV circuit miles from transmission to distribution in accordance with FERC's seven-factor test.

Figure 22. Customer O&M Expense per Total MWh[9]

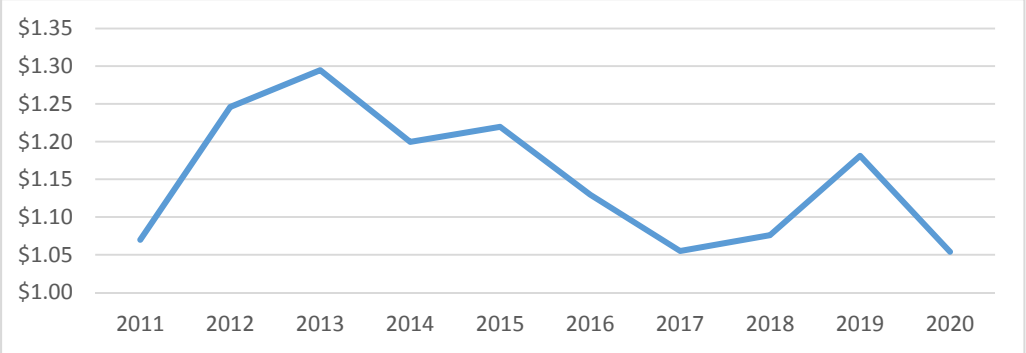


Figure 22 illustrates the customer O&M expense per total megawatt hour. Customer expense accounts in the FERC Form 1 are organized into three parts: customer accounts, customer service and information, and sales. Figure 22 illustrates the sum of these accounts divided by total sales. The decline in 2020 was mostly driven by changes in spending related to COVID-19 and by reduced load.

The principal driver of transmission expense during the period has been *Account 561.8, Reliability, Planning, and Standards Development Services*. This account reflects the costs of three regional transmission expansion (TEP) project types that MISO has billed to NIPSCO through Schedule 26. The Commission authorized NIPSCO to begin recovering these costs through the utility's Regional Transmission Organization tracker (Rider 871) in 2012.

---

[8] Transmission (Page 321 line 112); distribution (Page 322, line 156) / MWh (Page 301, line 12(d); per pole mile uses (Page 422, line 36).

[9] Page 323, line 164 + line 171 + line 178 / Page 301, line 12(d).

The largest component of distribution expense each year is *Account 593, Maintenance of Overhead Lines*, which has averaged 50% of the total expenses in this category since 2011. The reliability section in this report discusses how NIPSCO's investment in vegetation management the past few years has positively affected its reliability indices.

Administrative and general (A&G) expenses is the final O&M component shown in the FERC Form 1. This part includes accounts such as A&G salaries, office expenses, outside services employed, and employee benefits. These expenses are primarily fixed, meaning they do not rise and fall in the short-run with sales.

Figure 23. A&G O&M Expense per Total MWh[10]

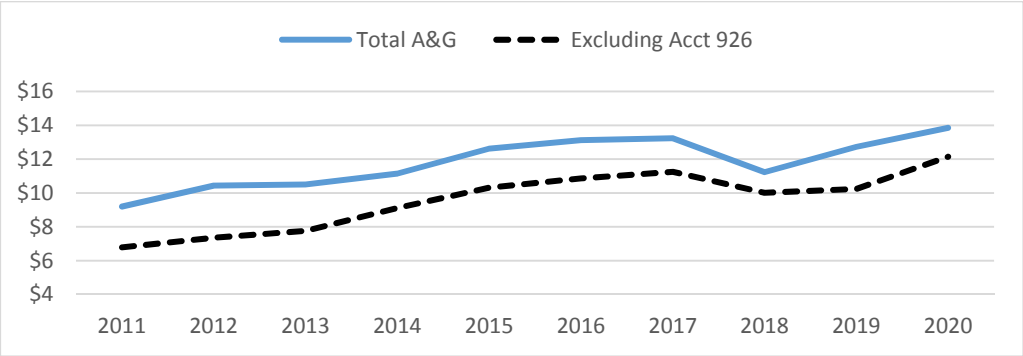
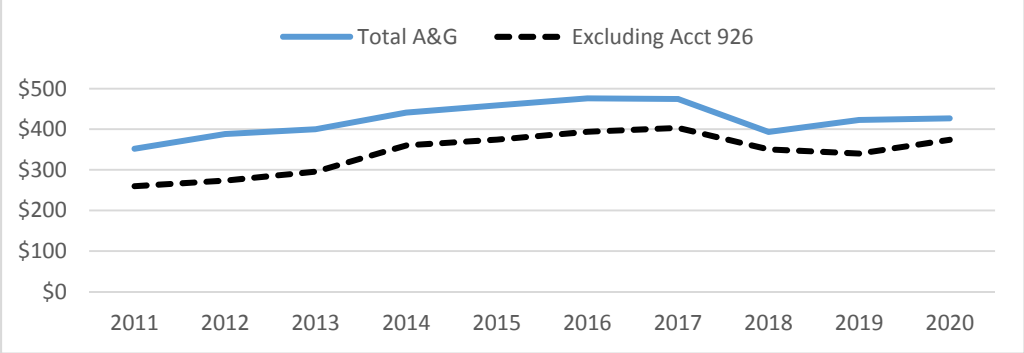


Figure 24. A&G O&M Expense per Retail Customer[11]



Figures 23 and 24 show A&G expenses as a function of total sales and retail customers. The figures also represent the metrics without *Account 926, Employee Pensions and Benefits*. This account is largely driven by interest rates and investment returns, two functions significantly outside of the utility's control.

[10] Page 323, line 197 / Page 301, line 12(d); Acct 926 is Employee Pensions and Benefits expense (Page 323, line 187).

[11] Page 323, line 197 / Page 301, line 12(f); Acct 926 is Employee Pensions and Benefits expense (Page 323, line 187).

Benchmarking Analysis

This section illustrates the respective metrics of NIPSCO and the median Indiana electric investor-owned utilities against nationally comparable data. The data of the 20% of U.S. utilities with the lowest (best) metrics (i.e., the first quintile) is represented within the dark blue section at the bottom of each graph. Each colored area above the first quintile represents a successive quintile.

Figure 25. O&M Expense per Retail MWh

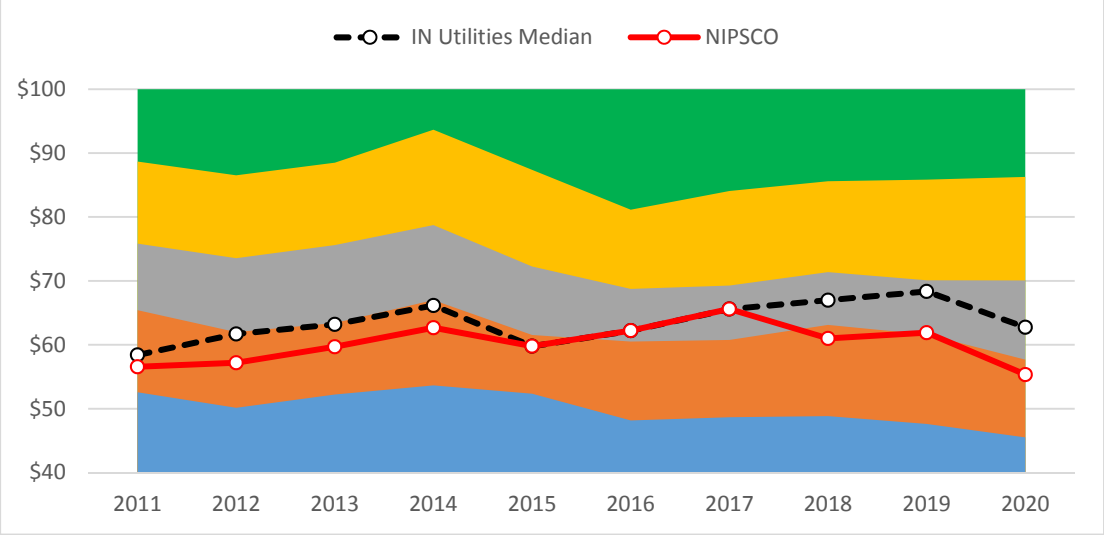


Figure 25 illustrates the O&M expense per retail megawatt hour.

Figure 26. Non-fuel O&M Expense per Retail MWh

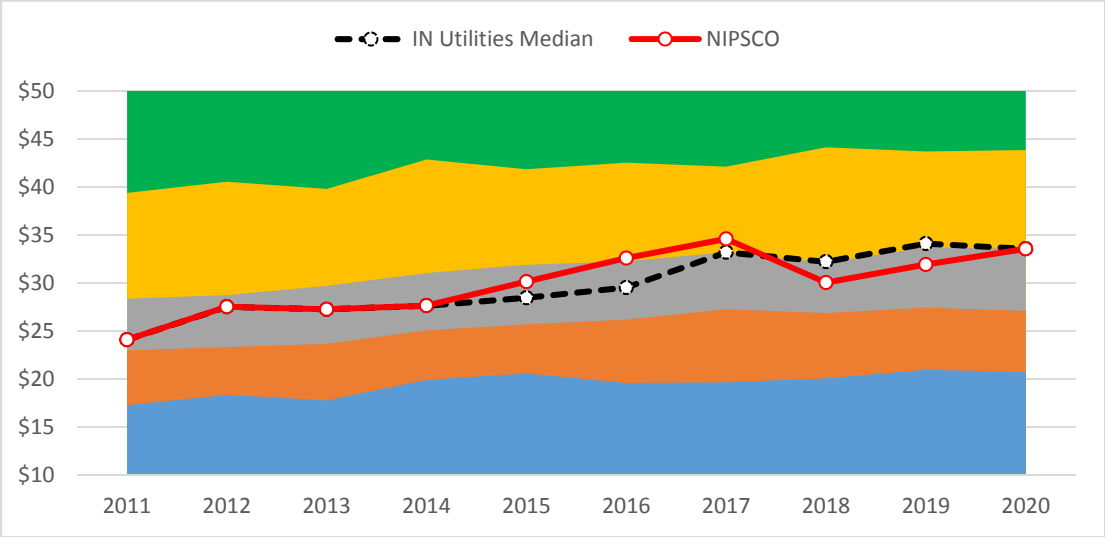


Figure 26 illustrates the non-fuel O&M expense per retail megawatt hour.

Figure 27. A&G O&M Expense (net of Acct 926) per Retail MWh

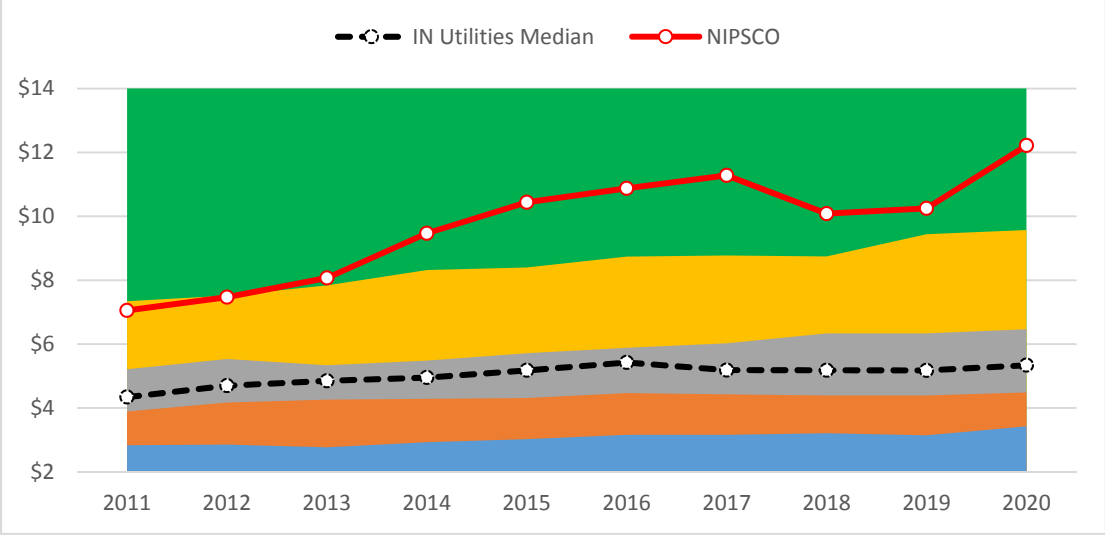


Figure 27 is the A&G O&M expense (net of Acct 926) per retail megawatt hour. The increase in 2020 is due to declining sales volumes related to COVID-19 and the implementation of Rate 831. Although costs were up about 1.5%, volumes (primarily industrial) were down by 6.5%[12].

[12] Total retail sales in 2019 were 15.7 M MWh, compared to 14.6 M MWh in 2020. Total A&G expense in 2019 was $200M compared to $204M in 2020.

AFFORDABILITY

Customer Bills

NIPSCO's electric base rates in 2020 went into effect on January 1, 2020 and changed from 700 to 800 series.

Figure 28. Residential bills[13]

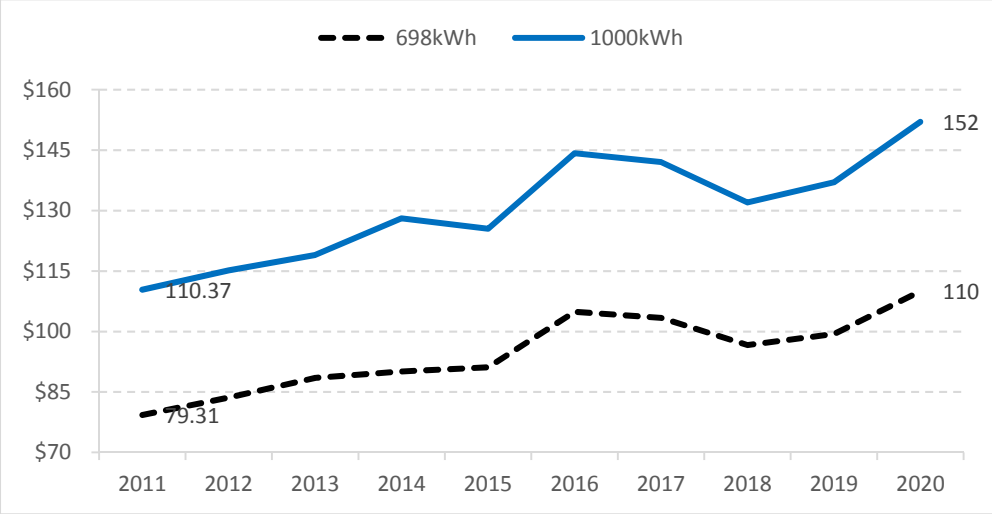


Figure 28 illustrates the average monthly bill for residential customers. NIPSCO's customers experienced a decrease in bills in 2018 primarily driven by the Tax Cuts and Jobs Act of 2017. The average monthly usage of NIPSCO's residential customers during the test year of the Company's rate case establishing these rates was 698 kWh.

The figures below depict seven of the 15 demand and usage combinations that the Edison Electric Institute includes in its *Typical Bills and Average Rates Report*, which is published each winter. The average rates for all 15 combinations are included in the appendix to this report. Where applicable, the figures below reference "X" as the first number of the rate to indicate 2011-2019 is the 700 series rates and 2020 is the 800 series. Because of the change in rate structure for industrial customers (see below) a separate figure is included for some of the new 800 series rates beginning in 2020.

[13] The IURC calculates each utility's electric bill on July 1 each year and reports this information at https://www.in.gov/iurc/2761.htm. For consistency, the 698 kWh number reflects July 1, 2020 data as well.

Figure 29. Commercial bills

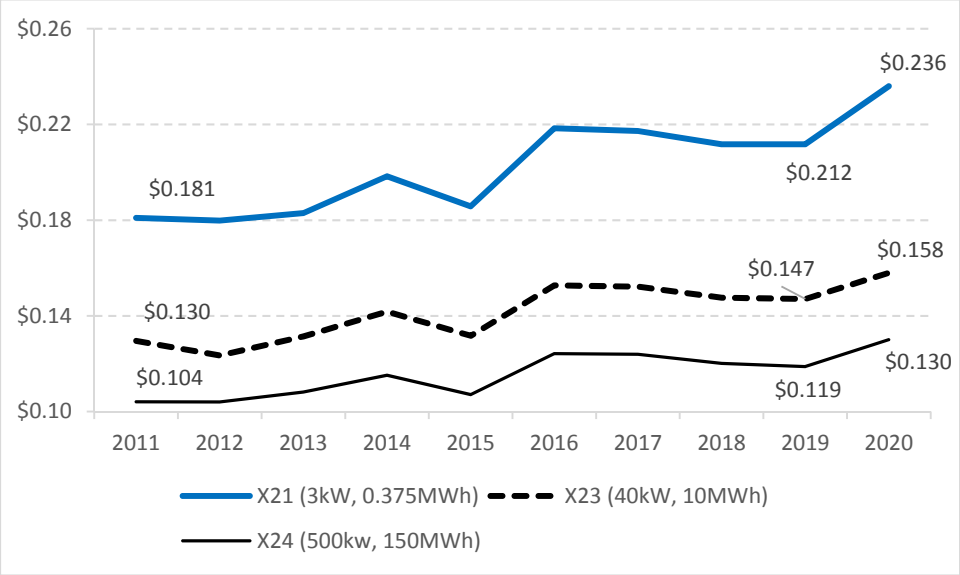


Figure 29 illustrates the average commercial bill per kilowatt hour.

Figure 30. Industrial bills[14]

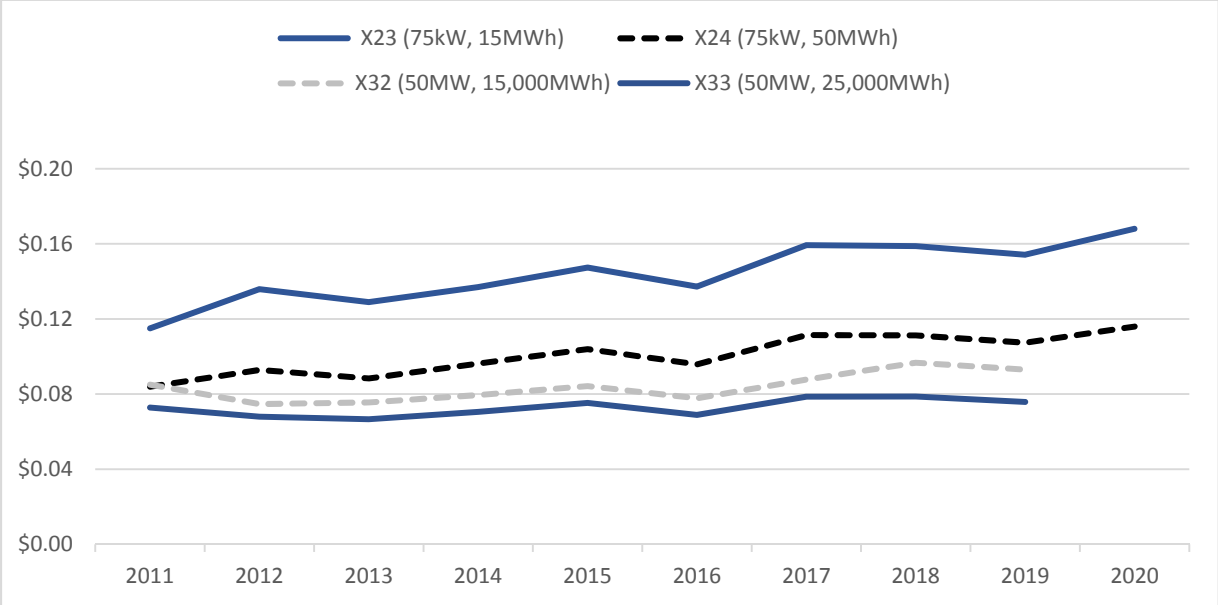


Figure 30 is the average industrial bill per kilowatt hour.

Figure 31. Industrial bills (800 series rates)[15]

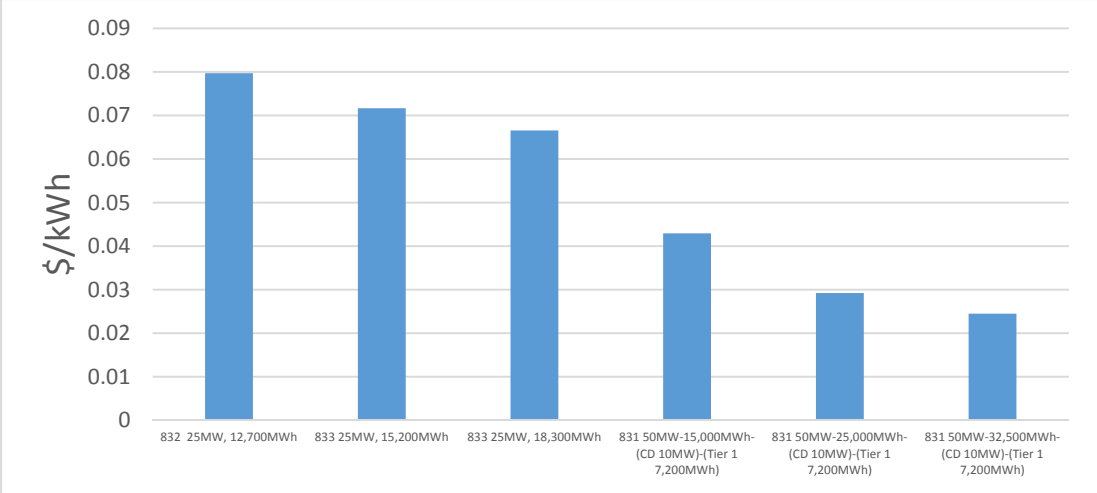


Figure 31 represents the average industrial bill for Rates 831, 832, and 833.

---

[14] The rates for Rate 831 do not include Tier 2 and/or Tier 3 Energy Charges and costs to obtain Tier 2 and/or Tier 3 Capacity.

[15] Rates are not continued for Rate 832 and Rate 833 data due to the changes in these Rates in 2020. The criteria used (50 MW) no longer applies to Rates 832 and 833. Maximum Demands for these two Rates is 25 MW.

Service Disconnections

Figure 32. Residential service disconnections

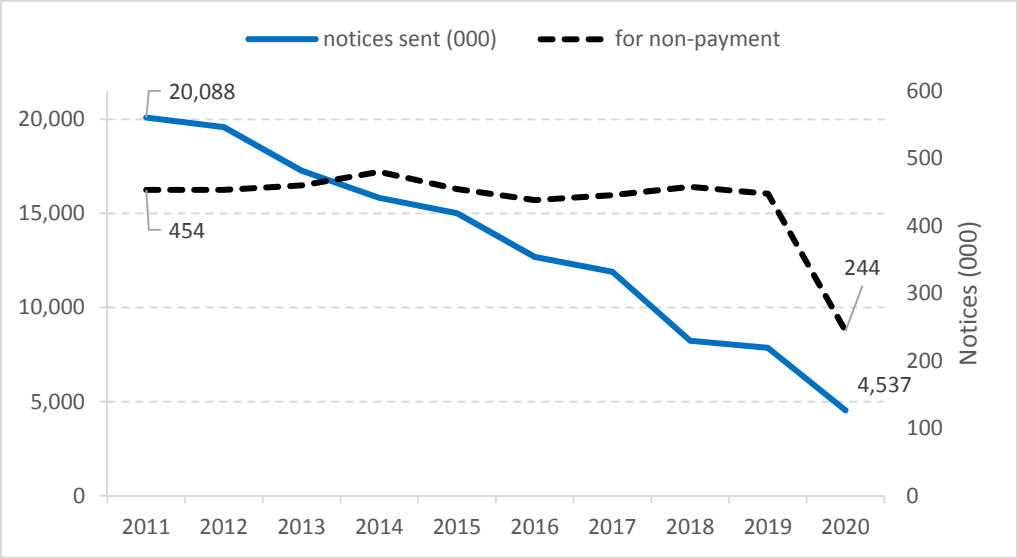


Figure 32 illustrates the number of notices sent to residential customers regarding disconnection for non-payment and the number of disconnections performed[16]. NIPSCO mails a notice of disconnection to a customer 12 days after the customer's bill is due. NIPSCO continues to work with customers with arrears by initiating telephone calls to facilitate payment arrangements.

As a result, fewer orders for disconnection are sent to the field. In addition, in June 2018, NIPSCO launched a new program that allows for customers to make payments over the telephone while the technician is on-site to complete the disconnection, thereby providing a final opportunity to avoid disconnection. These efforts have led to significant reductions in disconnections for non-payment as compared to earlier years. In addition, the disconnection moratorium in effect from March 13, 2020 until August 17, 2020 had a dramatic impact on the number of disconnections. It is expected that 2021 disconnection rates will return to closer to 2018-2019 levels.

[16] Please note, this figure will not match the numbers reported in Cause No. 45380 (the COVID-19 investigation) as that includes all disconnections and not just residential electric customers as reported here.

Figure 33. Average residential accounts in arrears at least 60 days

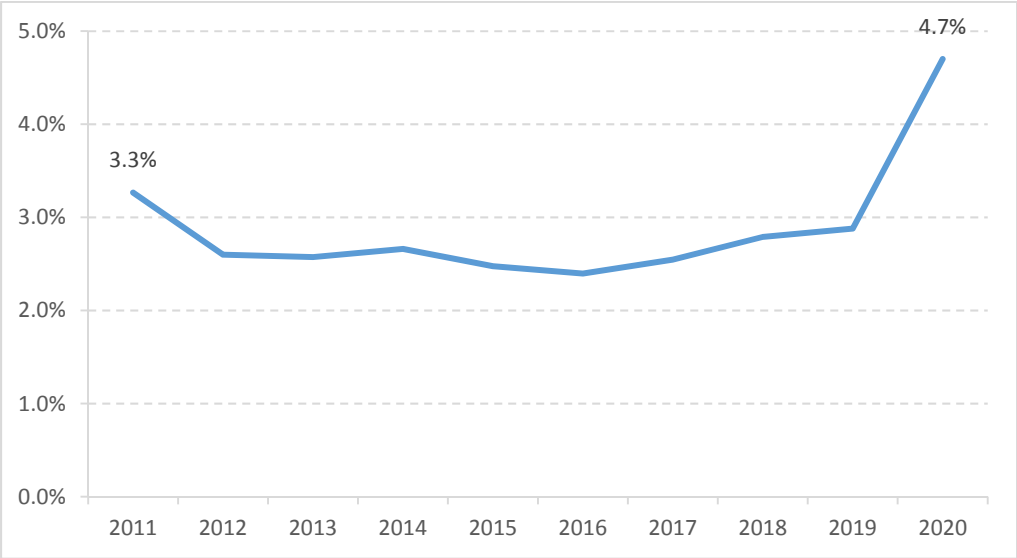


Figure 33 shows the average percentage of residential accounts in arrears at least 60 days. The COVID-19 pandemic had a significant impact on the number of accounts in arrearages over 60 days. While the first quarter of the year was in line with previous years, the average for the year was 4.7%, with the high for the year being 6.5%. NIPSCO anticipates a return to more normal numbers in 2021.

STAFFING

Figure 34. Employee turnover

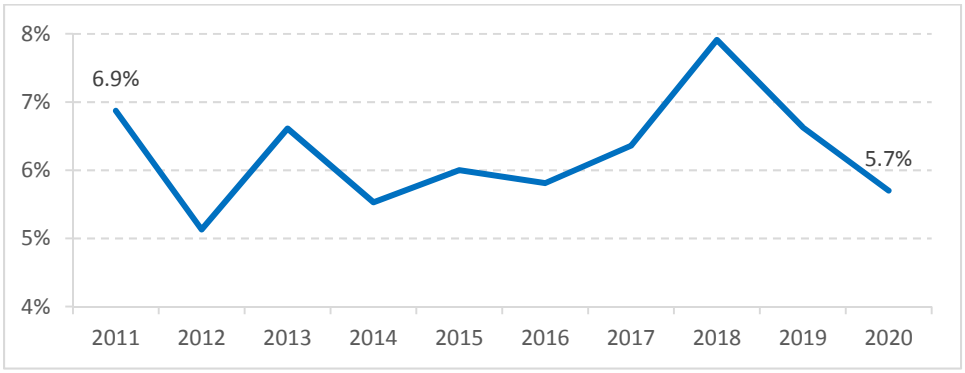


Figure 34 illustrates employee turnover. NIPSCO's employee turnover ratio is calculated using the average number of employees during the year. The uptick in 2018 was primarily driven due to retirements. In 2020, some NIPSCO employees were offered a voluntary severance plan. In order to remain consistent with prior years, those employees were not included in the calculation.

Figure 35. Diverse Employees

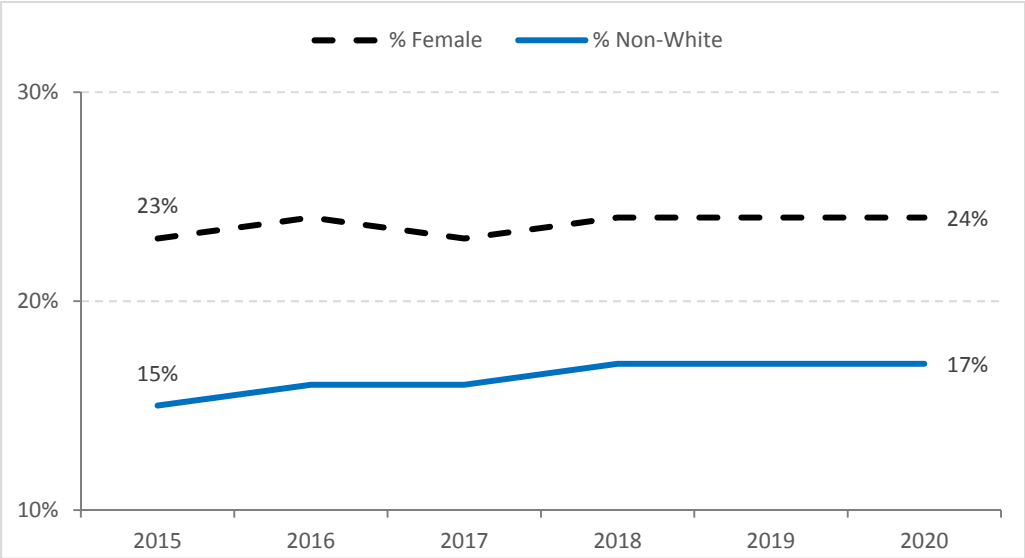


Figure 35 is a new addition for the 2020 report and shows the data back to 2015, the earliest for which it was available. Approximately one-quarter of NIPSCO's workforce is female and 17% is non-white. NIPSCO is committed to attracting and retaining a diverse and qualified workforce. Inclusion and diversity, not only of race or gender, but of thought, life experience, culture, ability, generation, sexual orientation, and other characteristics, is an ongoing, strategic initiative that is part of the Company's operating plan. NIPSCO sponsors and participates in job fairs which include the American Association of Blacks in Energy National Conference, the United States Hispanic Leadership Institute, Indiana Black Expo, and the Times of Northwest Indiana. NIPSCO posts to well over 480 job sites, including military networks, University/College sites, Disability sites, Federal Government, State Government, Metro Areas, Diversity and others such as those that cater to engineers. NIPSCO engages in community outreach to over 45 organizations and also uses 39 specific sites in CareerBuilder to engage with diverse groups.

Retention of employees is also a key component of NIPSCO's operating plan. New Employee Orientation begins with a formal process on the first day of employment and then job-specific training is conducted. NIPSCO has also developed numerous Affinity Groups (Employee Resource Groups) to promote networking and support.

CONCLUSION

NIPSCO continues to focus on safety; reliability; customer service; investment and spending; and affordability. In 2020, in addition to navigating the challenges brought about by COVID-19, NIPSCO saw improvements in several areas, and laid plans for additional improvements in other areas. The common theme in all of these areas is NIPSCO's commitment to its customers. Building on the SMS will continue to improve safety, which benefits employees, contractors, customers, and communities. NIPSCO will strive to continue to improve its reliability metrics and maintain its focus on vegetation management. In addition, the Company recognizes the importance of providing excellent customer service and maintaining affordability, through rates, investments, and spending. Key to achieving all of these goals is continued employee engagement. NIPSCO appreciates the opportunity to review these metrics with its stakeholders as it provides valuable input into the process of continued improvement.

2020 Performance Metric Report

	Fig.	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Safety											
Preventable vehicle crash rate	1	5.10	3.26	2.28	2.14	2.43	1.76	1.84	1.97	2.85	1.91
OSHA recordable incident rate	2	2.61	2.70	1.57	1.41	2.20	2.23	1.29	2.23	2.70	2.26
DART		1.01	1.60	1.08	0.97	1.18	1.37	0.61	1.61	1.95	1.4
OSHA rate NIPSCO w/BSA	3	2.61	1.83	1.5	1.26	1.23	1.2	0.75	1.14	1.33	1.24
DART - NIPSCO with BSA		1.1	1.04	0.93	0.84	0.65	0.61	0.33	0.68	0.88	0.75
Underground damages	4	3.48	4.50	3.73	3.11	3.00	2.56	2.48	2.05	1.97	2.19
Reliability											
Major event days	5	7	5	6	7	3	4	2	5	8	5
Assoc. restor. days		15	12	8	11	5	6	2	7	14	8
TMED (minutes)		11.8	11.5	9.4	8.2	9.5	8.7	8.2	7.9	7.8	8.5
SAIDI (MED)	6/7	371	428	524	603	248	231	153	244	359	473
(non-MED)		156	137	116	109	128	141	131	151	155	138
SAIFI (MED)		1.38	1.44	1.46	1.53	1.16	1.26	1.11	1.33	1.58	1.264
(non-MED)		1.03	0.95	0.84	0.89	0.93	1.01	1.01	1.09	1.07	0.901
CAIDI (MED)		269	297	359	395	214	184	138	184	227	374
(non-MED)		151	145	138	122	137	139	130	139	145	153
Generating unit capacity	8	(shown in figure)									
EAF	9										
12 Michigan City		89.88%	81.20%	64.72%	86.10%	55.36%	53.63%	45.38%	63.45%	49.30%	62.17%
7 Bailly		70.81%	82.09%	92.36%	78.74%	70.13%	75.29%	63.93%	42.23%	Retired	Retired
8 Bailly		74.38%	75.95%	84.12%	69.15%	67.23%	57.44%	66.03%	0.00%		
14 Schahfer		69.14%	76.55%	74.21%	77.99%	69.18%	74.89%	87.62%	61.41%	51.44%	45.21%
15 Schahfer		75.66%	81.72%	73.63%	66.22%	87.36%	80.75%	55.15%	80.28%	62.94%	48.79%
17 Schahfer		91.84%	74.69%	86.52%	81.48%	74.99%	89.12%	67.84%	87.24%	79.62%	82.13%
18 Schahfer		75.99%	96.97%	94.11%	75.52%	87.18%	60.40%	92.60%	67.51%	79.45%	73.57%
Coal (weighted avg)		*79.01%*	*81.22%*	*79.25%*	*76.40%*	*73.15%*	*69.91%*	*67.74%*	*66.64%*	*63.24%*	*61.06%*
Sugar Creek		88.56%	95.27%	91.81%	93.71%	78.90%	96.28%	91.00%	73.29%	88.90%	81.38%
EFOR	10										
12 Michigan City		5.14%	1.17%	6.59%	1.09%	0.47%	16.25%	6.68%	24.36%	15.05%	22.88%
7 Bailly		7.47%	1.88%	3.95%	3.45%	20.69%	8.32%	15.77%	56.01%	Retired	Retired
8 Bailly		7.48%	7.81%	4.92%	8.78%	13.20%	22.01%	17.00%	100.00%		
14 Schahfer		3.20%	19.26%	10.52%	19.02%	32.89%	51.25%	17.94%	20.80%	39.83%	88.14%
15 Schahfer		9.61%	13.12%	1.76%	11.03%	5.62%	15.46%	17.29%	19.08%	23.28%	59.71%
17 Schahfer		7.50%	7.01%	5.20%	10.29%	0.66%	6.16%	12.75%	6.15%	10.90%	8.49%
18 Schahfer		4.11%	1.55%	0.19%	4.89%	2.69%	6.57%	2.60%	11.19%	15.21%	13.95%
Coal (weighted average)		*6.36%*	*7.43%*	*4.46%*	*8.28%*	*7.78%*	*16.54%*	*11.14%*	*19.66%*	*21.24%*	*40.27%*
Sugar Creek		0.96%	1.66%	1.89%	0.41%	2.43%	0.82%	1.54%	5.93%	5.33%	0.60%
Net capacity factor	12										
12 Michigan City		72.10%	56.82%	49.25%	66.67%	40.17%	41.30%	31.41%	51.19%	26.12%	37.85%
7 Bailly		56.95%	44.48%	52.61%	53.50%	48.89%	53.58%	47.61%	36.58%	Retired	Retired
8 Bailly		60.38%	41.73%	54.68%	50.35%	26.98%	36.44%	31.33%	0.00%		
14 Schahfer		52.58%	27.12%	40.83%	40.20%	13.21%	12.21%	17.00%	38.98%	32.20%	4.65%
15 Schahfer		59.41%	55.92%	54.02%	47.28%	45.04%	24.13%	20.25%	51.59%	37.62%	18.16%
17 Schahfer		47.18%	30.42%	41.62%	65.64%	38.81%	49.30%	39.76%	55.00%	39.79%	29.61%
18 Schahfer		52.06%	51.13%	71.35%	63.88%	56.69%	44.11%	70.27%	44.64%	46.06%	26.07%
Coal (weighted avg)		*57.80%*	*44.54%*	*51.63%*	*55.30%*	*37.64%*	*35.02%*	*34.62%*	*45.05%*	*35.76%*	*23.03%*
Sugar Creek		46.64%	64.18%	50.98%	45.81%	68.41%	78.33%	73.79%	61.15%	75.91%	68.75%
Customer Satisfaction											
Avg speed of answer (sec)	13	51	20	21	29	18	21	28	27	45	68
Abandonment rate		2.8%	1.3%	1.5%	1.6%	1.4%	1.6%	2.3%	2.2%	2.9%	6.5%
First call resolution	14	74%	79%	75%	77%	77%	80%	87%	87%	87%	86%
Meter reading		91%	94%	92%	92%	99%	100%	100%	100%	100%	100%
Customer survey	15	88%	86%	83%	84%	87%	88%	88%	90%	89%	88%
J.D. Power scores											
Residential (electric)	16	585	604	624	618	648	645	704	706	714	743
Business (electric)		640	645	616	653	612	671	735	760	771	722
Complaints to regulator											
Substantiated	17	2	2	1	0	1	2	1	0	0	1
Total		84	62	66	73	78	64	61	77	98	38
Unsubstatiated		82	60	65	73	77	62	60	77	98	37

	Fig.	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
O&M Expenses											
O&M per MWh (total)	18	$56.57	$57.19	$59.70	$62.67	$59.79	$62.21	$65.59	$61.00	$61.89	$55.35
(non-fuel)		$24.09	$27.52	$27.26	$27.63	$30.14	$32.59	$34.59	$30.04	$31.93	$33.56
O&M per customer (total)	19	$2,084	$2,095	$2,186	$2,386	$2,146	$2,254	$2,346	$2,120	$2,055	$1,695
(non-fuel)		$888	$1,008	$998	$1,052	$1,082	$1,181	$1,237	$1,044	$1,060	$1,028
Non-fuel production O&M											
per MWh sold	20	$9.27	$10.73	$9.63	$9.85	$11.02	$12.74	$14.17	$11.06	$10.73	$10.42
per MWH generated		$10.53	$13.74	$11.86	$12.11	$15.13	$17.71	$19.72	$15.11	$16.35	$20.14
Transmission per MWh	21	$1.15	$1.31	$1.69	$1.73	$2.14	$2.63	$2.76	$2.73	$3.17	$3.36
Transmission per pole mile		$2.51	$2.80	$2.76	$2.40	$2.47	$2.60	$2.97	$3.37	$3.74	$4.32
Distribution expense per MWh		$7,161	$7,985	$26,699	$28,367	$32,333	$39,913	$41,638	$36,477	$40,567	$36,159
Customer operations per MWh	22	$1.07	$1.25	$1.29	$1.20	$1.22	$1.13	$1.05	$1.08	$1.18	$1.05
A&G per MWh	23	$9.20	$10.44	$10.50	$11.15	$12.63	$13.13	$13.24	$11.24	$12.72	$13.86
excluding Acct. 926		$6.79	$7.36	$7.76	$9.12	$10.32	$10.86	$11.26	$10.01	$10.24	$12.15
A&G per customer	24	$352	$388	$400	$441	$459	$476	$474	$393	$423	$427
excluding Acct. 926		$260	$274	$296	$361	$375	$394	$403	$351	$340	$374
Benchmarking											
O&M expense per retail MWh	25										
1st quintile		$53	$50	$52	$54	$52	$48	$49	$49	$48	$46
2nd quintile		$65	$62	$63	$67	$62	$61	$61	$63	$52	$58
3rd quintile		$76	$74	$76	$79	$73	$69	$69	$71	$70	$70
4th quintile		$89	$87	$88	$94	$88	$81	$84	$86	$86	$86
Ind. IOU median		*$58*	*$62*	*$63*	*$66*	*$60*	*$62*	*$66*	*$67*	*$68*	*$63*
NIPSCO		*$57*	*$57*	*$60*	*$63*	*$60*	*$62*	*$66*	*$61*	*$62*	*$55*
O&M (net fuel) per retail MWh	26										
1st quintile		$17	$18	$18	$20	$21	$20	$20	$20	$21	$21
2nd quintile		$23	$23	$24	$25	$26	$26	$27	$27	$27	$27
3rd quintile		$28	$29	$30	$31	$32	$32	$33	$32	$34	$34
4th quintile		$39	$41	$40	$43	$42	$43	$42	$44	$44	$44
Ind. IOU median		*$24*	*$28*	*$27*	*$28*	*$28*	*$30*	*$33*	*$32*	*$34*	*$34*
NIPSCO		*$24*	*$28*	*$27*	*$28*	*$30*	*$33*	*$35*	*$30*	*$32*	*$34*
A&G (less Acct 926) per MWh	27										
1st quintile		$2.84	$2.85	$2.77	$2.93	$3.03	$3.16	$3.16	$3.21	$3.15	$3.43
2nd quintile		$3.89	$4.17	$4.26	$4.29	$4.31	$4.47	$4.43	$4.39	$4.39	$4.49
3rd quintile		$5.21	$5.54	$5.34	$5.48	$5.71	$5.98	$6.03	$6.34	$6.33	$6.47
4th quintile		$7.34	$7.52	$7.84	$8.32	$8.40	$8.74	$8.78	$8.74	$9.44	$9.57
Ind. IOU median		*$4.34*	*$4.70*	*$4.85*	*$4.96*	*$5.18*	*$5.43*	*$5.19*	*$5.18*	*$5.18*	*$5.34*
NIPSCO		*$7.05*	*$7.47*	*$8.07*	*$9.47*	*$10.44*	*$10.88*	*$11.28*	*$10.08*	*$10.25*	*$12.22*
Affordability											
Residential rates (as of July 1)											
Bill (698kWh)	28	$79	$84	$89	$90	$91	$105	$103	$97	$99	$110
Bill (1000kWh)		$110	$115	$119	$128	$125	$144	$142	$132	$137	$152
Components ($/kWh, May 1 of *following* year, as of July 1 for 2020)											
base fuel								$0.0325	$0.0325	$0.0325	$0.0267
O&M expense								$0.0294	$0.0294	$0.0294	$0.0406
D&A expense								$0.0133	$0.0133	$0.0133	$0.0259
taxes								$0.0100	$0.0073	$0.0073	$0.0072
NOI and settlement adjust't								$0.0130	$0.0130	$0.0130	$0.0220
capital trackers								$0.0016	$0.0038	$0.0039	$0.0028
expense trackers								$0.0138	$0.0126	$0.0077	$0.0121
total								$0.1136	$0.1119	$0.1071	$0.1373
20											
811 energy							11.0433	11.0433	10.6764	10.6764	0.1241
870 FAC							0.2625	0.0836	-0.3279	-0.1999	-0.0011
871 RTO							0.1664	0.1220	0.2138	0.1015	0.0026
872 ECR							0.9330	0.4221	0.2963	0.2745	0.0000
874 RA							0.3030	0.4388	0.4160	0.3651	0.0041
883 DSM							0.3157	0.3770	0.2272	0.5053	0.0056
887 FMC							-0.0011	-0.0019	0.0249	0.1325	0.0003
888 TDSIC							0.0000	0.3204	0.3159	0.3813	0.0011
Total variable charge							13.0228	12.8053	11.8426	12.2367	0.1368
Customer charge ($)						$11.00	$14.00	$14.00	$14.00	$14.00	$13.50
Commercial rates	29										
Rate *kW* *MWh* *LF%*											
721 3 0.375 17%		$0.181	$0.180	$0.183	$0.198	$0.186	$0.218	$0.217	$0.212	$0.210	$0.236
12 1.5 17%		$0.141	$0.140	$0.143	$0.158	$0.146	$0.170	$0.169	$0.164	$0.162	$0.175
723 40 10 34%		$0.130	$0.123	$0.131	$0.142	$0.132	$0.153	$0.152	$0.148	$0.147	$0.158
40 14 48%		$0.115	$0.108	$0.116	$0.127	$0.117	$0.137	$0.136	$0.131	$0.131	$0.144
724 500 150 41%		$0.104	$0.104	$0.108	$0.115	$0.107	$0.124	$0.124	$0.120	$0.119	$0.130
500 180 49%		$0.097	$0.097	$0.101	$0.108	$0.100	$0.117	$0.116	$0.113	$0.111	$0.122

				Fig.	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Industrial rates				30										
Rate	*kW*	*MWh*	*LF%*											
723	75	15	27%		$0.136	$0.129	$0.137	$0.147	$0.137	$0.159	$0.159	$0.154	$0.154	$0.168
	75	30	55%		$0.107	$0.100	$0.108	$0.118	$0.108	$0.128	$0.127	$0.123	$0.122	$0.135
724	75	50	91%		$0.093	$0.088	$0.096	$0.104	$0.096	$0.111	$0.111	$0.107	$0.106	$0.116
	1,000	200	27%		$0.120	$0.120	$0.125	$0.132	$0.124	$0.142	$0.142	$0.138	$0.137	$0.149
	1,000	400	55%		$0.091	$0.091	$0.095	$0.102	$0.094	$0.111	$0.110	$0.107	$0.105	$0.116
	1,000	650	89%		$0.080	$0.080	$0.084	$0.091	$0.083	$0.099	$0.098	$0.095	$0.093	$0.103
732	50,000	15,000	41%		$0.075	$0.076	$0.080	$0.084	$0.078	$0.088	$0.097	$0.093	$0.079	$0.076
733	50,000	25,000	68%		$0.068	$0.067	$0.071	$0.075	$0.069	$0.079	$0.079	$0.076	$0.070	$0.072
	50,000	32,500	89%		$0.057	$0.065	$0.066	$0.071	$0.065	$0.072	$0.071	$0.068	$0.066	$0.067
832	10,000	50,080	69%											
833	10,000	61,000	83%											
833	10,000	73,200	100%											
Residential disconnections				31										
for non-payment					20,088	19,585	17,271	15,824	15,011	12,689	11,900	8,232	7,854	4,537
notices sent (000)					454	454	460	480	455	438	446	458	448	244
disconnections by month														
Jan					1,408	1,875	1,466	354	863	835	1,304	22	483	837
Feb					866	1,560	1,284	219	323	912	1,456	415	881	600
Mar					2,018	1,806	1,418	1,084	1,411	1,068	1,132	928	776	468
Apr					1,751	1,655	1,892	1,653	1,635	953	817	861	786	0
May					1,748	1,571	1,580	1,665	1,318	740	1,150	1,253	628	0
Jun					1,711	1,339	1,145	1,635	1,393	872	962	997	726	1
Jul					1,482	1,029	1,323	1,353	907	885	854	801	628	0
Aug					1,914	1,644	1,196	1,437	1,262	1,185	1,323	808	684	12
Sep					1,607	1,471	1,061	1,425	908	951	745	406	691	879
Oct					1,436	1,553	1,365	1,341	1,158	939	1,026	619	677	668
Nov					1,211	1,107	796	452	999	930	804	533	456	611
Dec					925	963	732	1,192	819	403	327	589	438	461
Accounts in arrears				32										
Jan					4.0%	3.0%	2.7%	2.8%	2.8%	2.9%	2.6%	3.5%	2.8%	2.5%
Feb					4.2%	2.8%		2.8%	2.9%	2.4%	2.4%	3.5%	2.8%	2.6%
Mar					4.1%	2.6%	2.4%	2.5%	2.5%	2.0%	2.2%	3.2%	2.5%	2.7%
Apr					3.6%	2.5%	2.1%	2.5%	2.3%	2.3%	2.5%	2.7%	2.6%	4.1%
May					3.7%	2.7%	2.2%	2.7%	2.6%	2.3%	2.4%	2.3%	2.7%	5.7%
Jun					3.0%	2.8%	2.7%	2.8%	2.4%	2.2%	2.4%	2.5%	3.1%	6.0%
Jul					3.1%	2.3%	2.4%	2.6%	2.4%	2.4%	2.6%	2.4%	3.0%	6.5%
Aug					2.7%	2.1%	2.3%	2.4%	2.1%	2.0%	2.0%	2.3%	2.3%	5.8%
Sep					2.0%	2.2%	2.3%	2.2%	2.1%	1.9%	2.5%	2.5%	2.5%	5.6%
Oct					2.5%	2.6%	2.5%	2.3%	2.3%	2.4%	2.6%	2.6%	3.0%	5.4%
Nov					3.0%	2.7%	3.0%	3.1%	2.5%	2.7%	2.8%	2.8%	3.5%	4.9%
Dec					3.3%	3.1%	3.6%	3.3%	2.9%	3.2%	3.6%	3.2%	3.6%	5.1%
average					3.3%	2.6%	2.6%	2.7%	2.5%	2.4%	2.5%	2.8%	2.9%	4.7%
Employee turnover				33	6.9%	5.1%	6.6%	5.5%	6.0%	5.8%	6.4%	7.9%	6.6%	5.7%
% Workforce Female				34					23.00%	24.00%	23.00%	24.00%	24.00%	24.00%
% Workforce Non-White				35					15.00%	16.00%	16.00%	17.00%	17.00%	17.00%
Ratio data														
Energy (MWh, millions)														
Generated					15.39	13.28	14.18	14.79	12.20	12.11	12.02	12.04	10.32	7.61
Retail sales					16.84	16.76	16.80	17.51	16.56	16.81	16.69	16.63	15.71	14.62
Wholesale sales					0.65	0.25	0.67	0.68	0.19	0.02	0.03	0.114	0.010	0.080
O&M ($, millions)														
Total					$952	$958	$1,003	$1,097	$990	$1,046	$1,095	$996	$972	$809
Production					$709	$680	$713	$793	$676	$713	$754	$688	$640	$472
Fuel					$547	$497	$545	$614	$491	$498	$517	$506	$471	$319
Transmission					$20	$22	$29	$31	$36	$44	$46	$45	$50	$49
Distribution					$44	$48	$48	$44	$41	$44	$50	$55	$58	$63
Customer					$19	$21	$23	$22	$20	$19	$18	$18	$19	$15
A&G					$161	$178	$183	$203	$212	$221	$221	$185	$200	$204

MED Data (See MED Appendix Data)

DATE	SAIDI	SAIFI
5/29/2011	17.72	0.0434
5/30/2011	2.83	0.0115
5/31/2011	0.27	0.0035
6/4/2011	98.80	0.0976
6/5/2011	19.47	0.0137
6/6/2011	4.46	0.0097
6/7/2011	1.15	0.0050
6/8/2011	0.62	0.0052
6/9/2011	2.40	0.0167
7/1/2011	13.55	0.0446
7/2/2011	2.83	0.0134
7/3/2011	0.16	0.0011
7/11/2011	17.71	0.0537
7/12/2011	0.42	0.0034
7/13/2011	0.42	0.0070
7/22/2011	24.47	0.0545
7/23/2011	4.56	0.0129
7/24/2011	1.78	0.0091
7/25/2011	0.27	0.0033
11/29/2011	24.10	0.0438
11/30/2011	7.41	0.0104
12/1/2011	0.12	0.0006
6/29/2012	53.75	0.0780
6/30/2012	7.13	0.0191
7/1/2012	7.34	0.0279
7/2/2012	0.30	0.0034
7/5/2012	22.23	0.0548
7/6/2012	1.90	0.0057
7/7/2012	0.29	0.0048
7/18/2012	20.08	0.0535
7/19/2012	6.39	0.0281
7/20/2012	0.10	0.0007
7/24/2012	100.66	0.1670
7/25/2012	3.13	0.0074
7/26/2012	1.49	0.0064
8/4/2012	93.59	0.1400
8/5/2012	6.67	0.0135
8/6/2012	0.25	0.0018
8/7/2012	0.13	0.0007

DATE	SAIDI	SAIFI
6/12/2013	40.36	0.0965
6/13/2013	5.55	0.0126
6/14/2013	0.18	0.0011
6/24/2013	176.66	0.2160
6/25/2013	38.61	0.0457
6/26/2013	12.42	0.0119
6/27/2013	51.30	0.0736
6/28/2013	7.75	0.0257
6/29/2013	0.99	0.0061
11/17/2013	88.40	0.1684
11/18/2013	5.06	0.0086
11/19/2013	0.87	0.0054
11/20/2013	0.16	0.0012
11/21/2013	0.29	0.0024
3/12/2014	30.90	0.1174
3/13/2014	0.09	0.0007
5/11/2014	31.01	0.0628
5/12/2014	6.78	0.0114
5/13/2014	0.73	0.0039
5/14/2014	0.10	0.0010
6/30/2014	202.78	0.2132
7/1/2014	168.11	0.1271
7/2/2014	9.63	0.0098
7/3/2014	3.69	0.0121
7/4/2014	0.87	0.0050
7/5/2014	0.15	0.0006
9/20/2014	11.17	0.0318
9/21/2014	1.84	0.0089
9/22/2014	0.21	0.0010
10/31/2014	40.66	0.0742
11/1/2014	0.72	0.0017
11/2/2014	0.14	0.0009

DATE	SAIDI	SAIFI
2/1/2015	15.65	0.0543
2/2/2015	0.24	0.0012
7/18/2015	18.40	0.0446
7/19/2015	0.74	0.0027
12/28/2015	85.89	0.1257
12/29/2015	3.88	0.0061
12/30/2015	0.97	0.0049
12/31/2015	0.05	0.0002
2/19/2016	9.83	0.0499
2/20/2016	0.28	0.0017
2/21/2016	0.02	0.0002
2/24/2016	56.44	0.1050
2/25/2016	3.65	0.0104
2/26/2016	0.15	0.0011
7/21/2016	9.25	0.0449
7/22/2016	0.68	0.0031
12/4/2016	15.37	0.0479
12/5/2016	1.11	0.0093
1/10/2017	13.44	0.0584
1/11/2017	0.81	0.0042
3/8/2017	8.78	0.0452
3/9/2017	0.05	0.0003
7/4/2018	16.10	0.0420
7/5/2018	8.37	0.0278
7/6/2018	0.39	0.0019
7/7/2018	0.08	0.0007
7/8/2018	0.45	0.0024
9/25/2018	14.20	0.0447
9/26/2018	1.19	0.0065
10/20/2018	12.76	0.0377
10/21/2018	0.13	0.0009
11/26/2018	41.65	0.0892
11/27/2018	0.13	0.0004
11/28/2018	0.06	0.0006

DATE	SAIDI	SAIFI
2/12/2019	17.59	0.0553
2/13/2019	0.18	0.0014
5/23/2019	41.01	0.0891
5/24/2019	0.78	0.0048
5/25/2019	0.10	0.0005
6/26/2019	7.88	0.0297
6/27/2019	3.42	0.0167
6/28/2019	0.29	0.0027
8/18/2019	25.03	0.0594
8/19/2019	0.50	0.0026
8/20/2019	0.22	0.0013
9/3/2019	9.07	0.0360
9/4/2019	0.06	0.0005
9/27/2019	25.46	0.0676
9/28/2019	1.30	0.0037
9/29/2019	0.74	0.0040
10/21/2019	66.08	0.1229
10/22/2019	3.18	0.0063
10/23/2019	0.38	0.0036
10/24/2019	0.19	0.0012
11/27/2019	12.52	0.0530
11/28/2019	0.21	0.0021
6/9/2020	12.37	0.0428
6/10/2020	31.08	0.0483
6/11/2020	0.95	0.0022
6/12/2020	0.37	0.0029
6/26/2020	17.24	0.0418
6/27/2020	1.44	0.0049
6/28/2020	0.31	0.0017
8/10/2020	242.89	0.2105
8/11/2020	31.16	0.0194
8/12/2020	5.81	0.0045
8/13/2020	1.18	0.0013
8/14/2020	1.34	0.0060
8/15/2020	0.61	0.0028