

OFFICIAL
EXHIBITS

FILED
January 14, 2020
INDIANA UTILITY
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF DUKE ENERGY INDIANA, LLC FOR)
APPROVAL OF (1) AN ADJUSTMENT TO ITS RATES)
THROUGH ITS STANDARD CONTRACT RIDER NO. 66-A)
FOR DEMAND SIDE MANAGEMENT AND ENERGY)
EFFICIENCY PROGRAM COST RECOVERY, INCLUDING)
RECONCILIATION OF COSTS IN ACCORDANCE WITH)
THE FINAL ORDERS IN CAUSE NOS. 43955, 43955 DSM-1,)
43955 DSM-2, 43955 DSM-3, 43955 DSM-4, 43955 DSM-5 AND)
43955 DSM-6)

CAUSE NO. 43955 DSM-07

JURC
JOINT

EXHIBIT No. 1


DATE

1-16-20 AT
REPORTER

JOINT MOTION OF THE INDIANA OFFICE OF UTILITY
CONSUMER COUNSELOR AND DUKE ENERGY INDIANA
FOR SUBMISSION OF STIPULATION OF TESTIMONY

The Office of Utility Consumer Counselor ("OUCC") and Duke Energy Indiana ("DEI"), by counsel, hereby request the Commission accept the attached Stipulation of Testimony and attachment for DEI witness Ms. Karen Holbrook in this Cause. As a result of this Stipulation, the OUCC and DEI have agreed to waive cross-examination of all witnesses for both parties, and stipulate to the admissibility of prefiled testimony and rebuttal evidence by both parties.

Respectfully submitted,



Jeffrey M. Reed
Attorney No. 11651-49
Deputy Consumer Counselor

Indiana Utility Regulatory Commission Cause No. 43955 DSM-7

In lieu of cross-examination of Duke Energy Indiana (“DEI”) witness Ms. Karen Holbrook by the Indiana Office of Utility Consumer Counselor (“OUCC”), DEI and the OUCC agree to the following Stipulation of Facts:

1. The 800 MW figure shown in Ms. Holbrook’s Rebuttal Testimony at page 4, line 22 is a rounded average number from the 2015 IRP Table 8-M which shows the annual summer projections of load, capacity and reserves. The Energy Efficiency and Demand Response lines for the years 2017, 2018 & 2019 average 800 MW. A copy of Table 8-M is attached to this Stipulation.
2. Of the 800 MW, there are approximately 150 MW that are attributable to energy efficiency and demand response programs included for cost recovery in this proceeding. The remaining approximately 650 MW are attributable to Power Share and Interruptible programs that are recovered outside of this proceeding in Rider 70 or via special contracts.

Table 8-M: Load, Capacity and Reserves Table

**Summer Projections of Load, Capacity, and Reserves
for Duke Energy Indiana 2015 IIP**

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	
Load Forecast																						
1 DEI System Peak	6,259	6,401	6,535	6,613	6,662	6,705	6,732	6,769	6,805	6,836	6,881	6,916	6,960	6,992	7,035	7,075	7,137	7,193	7,246	7,288	7,330	
Reductions to Load Forecast																						
2 New Conservation Programs ^a	(9)	(31)	(56)	(83)	(110)	(134)	(159)	(162)	(183)	(195)	(210)	(223)	(228)	(228)	(232)	(235)	(238)	(241)	(244)	(248)	(250)	
3 Demand Response Programs	(632)	(677)	(696)	(720)	(735)	(751)	(756)	(761)	(766)	(772)	(777)	(782)	(787)	(792)	(797)	(802)	(808)	(813)	(818)	(823)	(828)	
4 Adjusted Duke System Peak	5,618	5,693	5,783	5,810	5,817	5,820	5,818	5,846	5,857	5,869	5,894	5,911	5,946	5,972	6,007	6,038	6,092	6,140	6,184	6,218	6,252	
Cumulative System Capacity																						
5 Generating Capacity	7,387	7,387	6,719	6,719	6,553	6,273	6,267	6,267	6,267	6,267	6,267	6,267	6,267	6,267	6,267	6,267	6,267	6,267	5,957	5,957	5,957	5,957
6 Capacity Additions	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
7 Capacity Derates	0	0	0	0	0	(6)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
8 Capacity Retirements	0	(668)	0	(166)	(280)	0	0	0	0	0	0	0	0	0	0	0	0	(310)	0	0	0	
9 Cumulative Generating Capacity	7,387	6,719	6,719	6,553	6,273	6,267	6,267	6,267	6,267	6,267	6,267	6,267	6,267	6,267	6,267	6,267	6,267	5,957	5,957	5,957	5,957	
Purchase Contracts																						
10 Cumulative Purchase Contracts	13	21	21	21	21	21	21	19	19	19	19	19	19	6	6	6	6	6	6	6	6	
11 Behind the Meter Generation	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	18	
12 Cumulative Future Resource Additions																						
Base Load	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Peaking/Intermediate	0	0	0	0	0	448	448	448	448	448	448	448	448	448	448	448	896	896	1,104	1,104	1,104	
Renewables	0	8	17	17	17	23	29	36	53	70	78	92	107	130	147	150	150	150	150	150	157	
PPA & Cogen	0	0	0	0	300	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	
13 Cumulative Production Capacity	7,418	6,767	6,775	6,609	6,629	6,792	6,798	6,802	6,819	6,836	6,844	6,858	6,873	6,884	6,900	6,903	7,041	7,041	7,249	7,249	7,256	
Reserves																						
14 Generating Reserves	1,800	1,074	993	799	812	972	981	956	962	967	950	947	928	912	894	865	950	902	1,065	1,032	1,004	
15 % Reserve Margin	32.0%	18.9%	17.2%	13.8%	14.0%	16.7%	16.9%	16.4%	16.4%	16.5%	16.1%	11.0%	15.6%	15.3%	14.9%	14.3%	15.6%	14.7%	17.2%	16.6%	16.1%	
16 % Capacity Margin	24.3%	15.9%	14.7%	12.1%	12.3%	14.3%	14.4%	14.1%	14.1%	14.1%	13.9%	13.8%	13.5%	13.2%	13.0%	12.5%	13.5%	12.8%	14.7%	14.2%	13.8%	

^a Not already included in load forecast. This value is coincident with the net peak load, so it may not be the peak value for the year.

CERTIFICATE OF SERVICE

Joint Motion of the Indiana Office of Utility Consumer Counselor and Duke Energy

Indiana for Submission of Stipulation of Testimony has been served upon the following parties of record in the captioned proceeding by electronic service on January 14, 2020.

Melanie Price
Andrew J. Wells
Nicholas K. Kile
Hillary J. Close

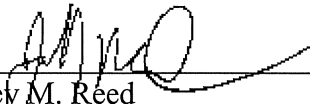
Duke Energy Indiana, LLC

melanie.price@duke-energy.com

andrew.wells@duke-energy.com

nicholas.kile@btlaw.com

hillaryclose@btlaw.com



Jeffrey M. Reed
Deputy Consumer Counselor

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

115 West Washington Street

Suite 1500 South

Indianapolis, IN 46204

infomgt@oucc.in.gov

317/232-2494 – Phone

317/232-5923 – Facsimile