

Joint NIPSCO-CAC Exhibit 8

Witness Holcomb

NIPSCO's Public Responses to CAC Data Requests 21-1 and 22-1.

Cause No. 45947
Northern Indiana Public Service Company LLC's
Objections and Responses to
Citizens Action Coalition of Indiana, Inc.'s Twenty-First Set of Data Requests

CAC Request 21-002:

Re: Rebuttal Testimony of Holcomb, NIPSCO Ex. 9-R, at pages 5-6:

"Intermediate load turbines are defined as units that are generating at a capacity factor greater than 20% but less than or equal to a 40% capacity factor. Intermediate load gas-fired turbines are subject to a standard of 1,170 lb. CO₂/MWh-gross. At an ambient temperature of 50.5°F and full load, the aeroderivative units together are expected to emit approximately 1,093 lb. CO₂/MWh-gross and meet the intermediate load standard. By comparison, at an ambient temperature of 50.5°F and full load, the frame unit is expected to emit approximately 1,177 lb. CO₂/MWh-gross and not meet the intermediate load standard."

- (a) Is NIPSCO's position on the frequency of use of the new CTs still as asserted in the Direct Testimony of Witness Walter at page 29, lines 5-6 ("NIPSCO currently projects capacity factors below 20%, except in the initial months of operation")? Please explain in detail.
- (b) Please provide an update to NIPSCO's responses (including the confidential attachment) to data requests CAC 1-019 and CAC 13-005 (asking about projected annual capacity factor for the new CT units).
- (c) NIPSCO stated in response to CAC 1-019 that it has "capacity factor projections for gas peaker projects as a whole," and that "NIPSCO has not performed analysis for each individual unit within the proposed CT Project." Is that still the case today? Please explain. To the extent such analysis has been performed, please provide the analysis in its native format, including a description of the inputs and assumptions and any associated workpapers, schedules, or input files used in the analysis.
- (d) Under what scenarios is NIPSCO projecting that any one of the proposed frame turbines, as a single unit, would run at greater than a 20% capacity factor in a 12-month period, as contemplated in new 40 C.F.R. § 60.5580a? Please explain in detail.

Cause No. 45947
Northern Indiana Public Service Company LLC's
Objections and Responses to
Citizens Action Coalition of Indiana, Inc.'s Twenty-First Set of Data Requests

(e) Under what scenarios is NIPSCO projecting that any one of the proposed frame turbines, as a single unit, would run at greater than a 20% capacity factor in a 3-year period, as contemplated in new 40 C.F.R. § 60.5580a? Please explain in detail.

Objections:

NIPSCO objects to this Request on the grounds and to the extent that this Request seeks information that is confidential, proprietary, and/or trade secret.

NIPSCO further objects to subparts (d) and (e) of this Request on the separate and independent grounds and to the extent they solicit an analysis, calculation or compilation which has not already been performed and to which NIPSCO objects to performing.

Response:

Subject to and without waiver of the foregoing general and specific objections, NIPSCO is providing the following response:

- a) Yes, based upon the circumstances as they exist today. Please also refer to NIPSCO's supplemental response to CAC Request 1-019. The supplemental response contains NIPSCO's most current available analysis regarding projected capacity factors and hours of operation, and no additional formal analysis has been performed to date. That said, higher capacity factors could be realized in the future that differ from the assumptions used in the 2023 portfolio analysis and should future circumstances present a need to run the units at higher capacity factors than currently projected, the finalization of the GHG Rule provides a flexibility for the aeroderivative units not enjoyed by the industrial frame units. Such a future could result if certain potential conditions materialize, including higher regional load growth; more capacity retirements or fewer new capacity additions; lower cost of natural gas relative to MISO power market prices (higher market heat rates), and; greater volatility associated with load, renewable output, and other resource availabilities. NIPSCO could manage overall plant output, including dispatch of individual aeroderivative units, within EPA rule limits as required, if regional economic conditions presented the opportunity for higher dispatch.
- b) No update is available to NIPSCO's supplemental response to CAC Request 1-019. The supplemental response contains NIPSCO's most current available analysis regarding projected capacity factors and hours of operation, and no

Cause No. 45947
Northern Indiana Public Service Company LLC's
Objections and Responses to
Citizens Action Coalition of Indiana, Inc.'s Twenty-First Set of Data Requests

additional analysis has been performed to date. See also NIPSCO's response to subpart (a) above regarding a future where higher capacity factors could be realized.

- c) Yes, that is still the case today. No additional analysis has been performed beyond the assumptions and outputs provided from the 2023 portfolio analysis in NIPSCO Witness Augustine's workpapers and associated discovery responses. See also NIPSCO's response to subpart (a) above regarding a future where higher capacity factors could be realized.
- d) NIPSCO has not performed any formal scenario analysis to identify the conditions under which any one of the proposed turbines would run at greater than 20% capacity factor in a 12-month period. As provided in NIPSCO's supplemental response to CAC Request 1-019, NIPSCO's 2023 portfolio analysis did not project capacity factors above 20% for the plant-level analysis that was performed for any 12-month period in 2027 and beyond. Conditions can reasonably be envisioned under which any one of the proposed turbines would run at greater than 20% capacity factor in a 12-month period. See NIPSCO's response to subpart (a).
- e) NIPSCO has not performed any formal scenario analysis to identify the conditions under which any one of the proposed turbines would run at greater than 20% capacity factor in a 3-year period. As provided in NIPSCO's supplemental response to CAC Request 1-019, NIPSCO's 2023 portfolio analysis did not project capacity factors above 20% for the plant-level analysis that was performed for any 3-year period in 2027 and beyond. Conditions can reasonably be envisioned under which any one of the proposed turbines would run at greater than 20% capacity factor in a 3-year period. See NIPSCO's response to subpart (a).

Cause No. 45947
Northern Indiana Public Service Company LLC's
Objections and Responses to
Citizens Action Coalition of Indiana, Inc.'s Twenty-Second Set of Data Requests

CAC Request 22-001:

Re: combustion turbine selection discussion in rebuttal testimony of Stephen Holcomb, NIPSCO Ex. 9-R, and rebuttal testimony of Greg Baacke, NIPSCO Ex. 5-R:

(a) Is the "CT OEM bid event" referenced in footnote 9 of Mr. Holcomb's rebuttal testimony the same as the "combustion turbine bid event" mentioned at page 17, line 14, of Mr. Baacke's rebuttal testimony?

(b) Is the "CT OEM bid event" referenced in footnote 9 of Mr. Holcomb's rebuttal testimony the same as the June 2023 "turbine equipment RFP" mentioned in Mr. Baacke's *direct* testimony at page 10, lines 11-12?

(c) Where Mr. Holcomb refers to "results of the CT [] OEM bid event" in footnote 9 of his rebuttal testimony, does "results" mean the bids received, or the selected bidders, or the selected turbine products, or the resulting contracts, or something else? Please explain.

(d) When does NIPSCO expect the "results of the CT [] OEM bid event" (as Mr. Holcomb uses that phrase) to be available?

(e) Where Mr. Baacke refers to "information received from equipment bid events for the CT original equipment manufacturer" at page 19, lines 6-7 of his rebuttal testimony, how was that information incorporated into NIPSCO's best estimate of cost? Does the incorporated information include any consideration of which CT OEM bids will actually be selected? Please explain in detail.

(f) Please update your responses to data requests CAC 12-003 and CAC 13-009 regarding NIPSCO's status of selecting a combustion turbine OEM supplier and issuing a Limited Notice to Proceed ("LNTP") to said supplier. Additionally:

(i) If NIPSCO has not yet selected the combustion turbine supplier, when does it plan to do so? What decision processes remain?

(ii) If NIPSCO has not yet issued a LNTP to a selected combustion turbine supplier, when does it plan to do so?

(g) Regarding Mr. Holcomb's statement in footnote 9 of his rebuttal testimony:

Cause No. 45947
Northern Indiana Public Service Company LLC's
Objections and Responses to
Citizens Action Coalition of Indiana, Inc.'s Twenty-Second Set of Data Requests

"The CTs being considered are capable of operating on natural gas fuel blended with between 15% and 35% hydrogen. However, specific hydrogen capabilities are dependent on the results of the CT [] OEM bid event."

- (i) What minimum hydrogen blending capability is NIPSCO requiring of any proposed combustion turbine as part of its selection process?
- (ii) What is NIPSCO's basis for determining its answer to (i) above?

Objections:

NIPSCO objects to subpart (g)(ii) of this Request on the grounds and to the extent that it is vague and ambiguous.

NIPSCO objects to this Request on the grounds and to the extent that this Request seeks information that is confidential, proprietary, and/or trade secret.

Response:

Subject to and without waiver of the foregoing general and specific objections, NIPSCO is providing the following response:

- (a) Yes.
- (b) Yes.
- (c) The reference to "results of the CT OEM bid event" is referring to the selection of turbine products and award of the CT OEM contract and issuance of the Limited Notice to Proceed.
- (d) As NIPSCO provided as CAC Request 19-001 Confidential Attachment A, NIPSCO finalized a Memorandum of Understanding on March 29, 2024. NIPSCO currently plans to issue the Limited Notice to Proceed for this equipment by June 14, 2024.
- (e) NIPSCO utilized the CT OEM's cost information from the bidder identified in CAC Request 19-001 Confidential Attachment A to update the best estimate. Row 14 of NIPSCO Witness Baacke's Confidential Attachment 5-R-B includes the CT OEM's combustion turbine equipment price.
- (f)
 - (i) As provided in NIPSCO's response to CAC Request 19-001 as CAC Request 19-001 Confidential Attachment A, NIPSCO finalized a Memorandum of

Cause No. 45947
Northern Indiana Public Service Company LLC's
Objections and Responses to
Citizens Action Coalition of Indiana, Inc.'s Twenty-Second Set of Data Requests

Understanding on March 29, 2024. NIPSCO is in the process of finalizing the working drafts listed as Exhibit A in the Memorandum of Understanding. NIPSCO currently plans to issue the Limited Notice to Proceed for this equipment by June 14, 2024.

(ii) See subpart (i) above.

(g)

- (i) NIPSCO did not provide a requirement for hydrogen blending capabilities during the CT OEM bid event. Rather, page 2 of the technical specification (Exhibit A - NIPSCO CTG Spec N-9200 - For Bid) provided in CAC Request 8-001 Confidential Attachment A stated:

Hydrogen capability will be viewed favorably, and the Supplier is asked to provide information regarding the effect of hydrogen blending on the Facility performance (output and heat rate) and price. Supplier is to explain the current maximum percent (% vol.) hydrogen capability for the machines without modification, the current maximum percent (% vol.) hydrogen capability for the machines with modifications, and the ability of the machines to burn 100% (vol.) hydrogen in the future. Supplier to provide price breakdown for CT modifications required to fire current percent (% vol.) hydrogen with detailed scope of supply.

- (ii) See response to subpart (i) above. NIPSCO did not provide a requirement for minimum hydrogen blending capabilities as this technology is still being researched, developed, and tested by combustion turbine OEMs and there is no environmental or other requirement to utilize hydrogen to fuel the CT Project's equipment.