

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF SOUTHERN INDIANA GAS AND)
ELECTRIC COMPANY D/B/A CENTERPOINT ENERGY)
INDIANA SOUTH ("CEI SOUTH") FOR AN ORDER: (1))
AMENDING THE COMMISSION'S OCTOBER 27, 2021)
ORDER IN CAUSE NO. 45501 PURSUANT TO IND. CODE §)
8-1-2-72 TO AUTHORIZE CEI SOUTH TO ENTER INTO AN)
AMENDED BUILD TRANSFER AGREEMENT ("BTA") TO)
ACQUIRE A SOLAR POWER ELECTRIC GENERATING)
FACILITY IN POSEY COUNTY, INDIANA, THAT WILL)
HAVE AN AGGREGATE NAMEPLATE CAPACITY OF)
APPROXIMATELY 191 MEGAWATTS ALTERNATING)
CURRENT ("MWAC") (THE "POSEY COUNTY SOLAR)
PROJECT") AND AMENDING THE CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY GRANTED)
THEREIN ACCORDINGLY; (2) FINDING THE REVISED)
COST OF THE POSEY COUNTY SOLAR PROJECT TO BE)
THE BEST ESTIMATE OF THE COST FOR THE PROJECT;)
(3) FINDING THE POSEY COUNTY SOLAR PROJECT)
CONTINUES TO BE A CLEAN ENERGY PROJECT UNDER)
IND. CODE CH. 8-1-8.8; (4) APPROVING ASSOCIATED)
RATEMAKING AND ACCOUNTING TREATMENT FOR)
THE POSEY COUNTY SOLAR PROJECT PURSUANT TO)
IND. CODE CH. 8-1-8.5 AND § 8-1-8.8-11; (5) AUTHORIZING)
CEI SOUTH TO ACCRUE POST-IN-SERVICE CARRYING)
COSTS ("PISCC") AND DEFER DEPRECIATION,)
OPERATIONS AND MAINTENANCE ("O&M") AND)
PROPERTY TAX EXPENSES ASSOCIATED WITH THE)
POSEY COUNTY SOLAR PROJECT; (6) IN THE EVENT)
THE CPCN IS NOT GRANTED OR THE POSEY COUNTY)
SOLAR PROJECT OTHERWISE IS NOT PLACED IN)
SERVICE, GRANTING AUTHORITY TO DEFER, AS A)
REGULATORY ASSET, COSTS ASSOCIATED WITH THE)
POSEY COUNTY SOLAR PROJECT FOR FUTURE)
RECOVERY THROUGH RETAIL ELECTRIC RATES; (7))
PROVIDING FOR ONGOING REVIEW OF THE POSEY)
COUNTY SOLAR PROJECT; (8) AUTHORIZING THE)
ESTABLISHMENT OF DEPRECIATION RATES FOR THE)
POSEY COUNTY SOLAR PROJECT; AND (9) APPROVING)
CONFIDENTIAL TREATMENT OF THE BTA AND OTHER)
COMMERCIAL TERMS AND RELATED CONFIDENTIAL)
INFORMATION.)

CAUSE NO. 45847

OFFICIAL
EXHIBITS

IURC
PUBLIC'S

EXHIBIT NO.

5-19-23

DATE

REPORTER


INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

REDACTED PUBLIC TESTIMONY OF OUCC WITNESS

DEREK J. LEADER - PUBLIC'S EXHIBIT NO. 1

APRIL 5, 2023

Respectfully submitted,

A handwritten signature in black ink, appearing to read "T. Jason Haas", written in a cursive style.

T. Jason Haas
Attorney No. 34983-29
Deputy Consumer Counselor

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TESTIMONY OF OUCC WITNESS DEREK J. LEADER
CAUSE NO. 45847
CENTERPOINT ENERGY INDIANA SOUTH

I. INTRODUCTION

1 **Q: Please state your name, business address, and employment capacity.**

2 A: My name is Derek J. Leader, and my business address is 115 West Washington St.,
3 Suite 1500 South, Indianapolis, Indiana 46204. I am employed by the Indiana
4 Office of Utility Consumer Counselor ("OUCC") as a Utility Analyst. My
5 qualifications are set forth in Appendix A of this document.

6 **Q: What is the purpose of your testimony?**

7 A: My testimony addresses Southern Indiana Gas and Electric Company d/b/a
8 CenterPoint Energy Indiana South's ("CEI South") request for the Indiana Utility
9 Regulatory Commission ("Commission") to approve changes to the Certificate of
10 Public Convenience and Necessity ("CPCN") the Commission approved in Cause
11 No. 45501. The changes reflect terms of the First, Second, and Third Amendments
12 to the Build Transfer Agreement ("BTA") as well as an Amended and Restated
13 Build Transfer Agreement (the "Amended & Restated BTA") entered into between
14 CEI South and the solar facility's developer Posey Solar CEI, LLC, an affiliate of
15 Arevon Energy, Inc. ("Arevon"). After considering several factors, including the
16 affordability of CEI South's rates, I, along with other OUCC witnesses, recommend
17 partial approval of the updated cost estimate, and conclude that some of the price
18 increases are reasonable. However, other elements of the price increases are not

1 reasonable, and this is reflected in the OUCC's partial approval of the updated cost
2 estimate.

3 **Q: Please describe the review and analysis you conducted to prepare your**
4 **testimony.**

5 A: I reviewed CEI South's Petition, prefiled testimony, exhibits, and workpapers in
6 this proceeding. In addition, I reviewed testimony and the Order from Cause No.
7 45501. I examined the cost increases concerning CEI South. Using information
8 from the Lawrence Berkeley National Laboratory, S&P Global, the Federal Bank
9 of St. Louis, and other sources noted below, I determined current market prices for
10 solar panels and materials and compared them to historical prices. I also met with
11 other OUCC analysts and discussed issues in the case.

12 **Q: To the extent you do not address a specific item, issue, or adjustment, does this**
13 **mean you agree with those portions of CenterPoint's proposals?**

14 A: No. Excluding any specific adjustments or issues CEI South proposes does not
15 indicate my approval of those adjustments or issues. Rather, the scope of my
16 testimony is limited to the specific items addressed herein.

17 **Q: Are you sponsoring any attachments?**

18 A: Yes. I am sponsoring the following attachments:

19 OUCC attachment DJL - 1, Information on CEI South's current rates.

20 OUCC attachment DJL - 2 (confidential), Calculation of relative value

21 OUCC attachment DJL - 3, News article from the Evansville Courier & Press
22 regarding CEI South's rates

23 **Q: Are additional witnesses testifying on the OUCC's behalf in this Cause?**

24 A: Yes. OUCC witness Brian Latham advocates for a reduction in the Project cost

1 estimate regarding Owner's Costs and Pre-Work costs, and OUCC witness Gregory

2 Krieger also advocates for a reduction in Owner's Costs.

II. CEI SOUTH'S REQUEST AND CASE BACKGROUND

3 **Q: Please describe CEI South's request in this Cause.**

4 A: CEI South seeks changes to the CPCN from the order approved in cause No. 45501

5 to reflect terms of the First, Second, and Third Amendments to the BTA as well as

6 the Amended & Restated BTA between CEI South and Arevon.

7 **Q: Please describe the changes in the amendments.**

8 A: The aggregate nameplate capacity of the Posey County Solar Project is decreasing

9 from 300 MWACs to 191 MWACs, and the BTA base purchase price has decreased

10 to [REDACTED]¹ [REDACTED]

11 [REDACTED]. These [REDACTED] are to make the

12 new agreement more responsive to uncertainty in the [REDACTED] and

13 [REDACTED] costs. It also commits the project to qualifying for special tax

14 incentives as part of the Inflation Reduction Act. However, CEI South's stated

15 estimated cost to complete the Project is approximately \$429 million.²

16 In Cause No. 45501, CEI South requested, and the Commission approved a

17 levelized rate for the Posey County Solar Project instead of a specific cost estimate.

18 However, the original purchase price of the Posey County Solar BTA presented to

19 the Commission was [REDACTED]³. Even though the new agreement contains

¹ Petitioner's Exhibit No. 2, Direct Testimony of F. Shane Bradford, Attachment FSB-4, Section 2.5(b), p. 21.

² Petitioner's Exhibit No. 4, Direct Testimony of Chrissy M. Behme, p.6, l. 27

³ Direct Testimony of OUCC Witness Gregory Krieger, Confidential Attachment GLK-1.

Material Highlighted in [REDACTED] is CONFIDENTIAL

1 some additional risks for CEI South, the base BTA purchase price has [REDACTED]
2 [REDACTED]. As OUCC witnesses Brian Latham and Gregory Krieger
3 discuss, CEI South's estimate contains unnecessary and unreasonable costs that
4 should not be approved. Therefore, the OUCC recommends that the approved cost
5 estimate for the Posey County Solar Project not exceed the original BTA purchase
6 price of [REDACTED]. The OUCC finds that this amount should provide CEI
7 South with enough funds to address additional potential costs within the contract
8 and provide a reasonable amount for Owner's and Planning/Pre-Work Costs.
9 Without this decrease to CEI South's estimate, the OUCC does not find it to be
10 reasonable for CEI South to continue with the Posey County Solar Project [REDACTED]
11 [REDACTED].

III. RATE IMPACT

12 **Q: Is CEI South's presentation of the Project's rate impact reasonable?**

13 **A:** No. CEI South indicates the residential impact of the Posey County Solar Project
14 as presented in Cause No. 45501 was approximately \$11.00 per month.⁴ CEI
15 South's estimated impact for a residential customer using 1,000 kWh per month for
16 the amended project is approximately \$12.00, although this amount does not
17 include offsets.⁵ However, the real size of the cost increase is [REDACTED] than CEI
18 South's rounded number of a \$1.00 difference. The original residential monthly
19 customer rate impact in Cause No. 45501 was [REDACTED] but was inclusive of the
20 Indiana Utility Receipts Tax ("IURT") Without the IURT, the rate impact would

⁴ Petitioner's Exhibit No. 3, Direct Testimony of Matthew Rice, p. 25, lines 19-21.

⁵ Rice Direct, p. 25, lines 15-19.

Material Highlighted in [REDACTED] is CONFIDENTIAL

1 have fallen to [REDACTED] which is the figure CEI South uses in Attachment MAR-1.
2 From that value, the proposed rate impact has risen to [REDACTED] Going from \$11.00
3 to \$12.00 represents a 9.09% increase, but going from [REDACTED]
4 increase. CEI South's rounding masks the actual rate impact to customers.

5 Furthermore, the OUCC is concerned about CEI South's unilateral decision
6 to label the rate impact for other customer classes as "confidential." By redacting
7 information regarding customer rate impact, CEI South creates unnecessary
8 barriers to transparency, significantly limiting customers' ability to know how they
9 and their finances will be impacted. While the OUCC's access to this information
10 allows it to conduct a meaningful review of the utility's filings, the lack of public
11 transparency impedes the ability of individual consumers to review or comment on
12 the proceeding in a meaningful manner.

13 **Q: Explain how the value of the Posey County Solar Project changed due to the**
14 **reduction in capacity and the price increase.**

15 **A:** Taking the exact numbers in OUCC attachment DJL – 2, I calculated the
16 proportional fraction of the original impact associated with the remaining 191
17 MWacs of the original 300 and the rate impact per MWac of the project. With these
18 values, the cost per MWac increased almost [REDACTED] This is in addition to CEI
19 South's other tracking mechanisms and recent renewable generation requests. CEI
20 South already has the highest electric rates among IURC-jurisdictional utilities and

⁶ Rice Direct, Attachment MAR-1 (Confidential).

⁷ Attachment DJL – 2.

has had the highest rates for a number of years.⁸ The OUCC is concerned with the affordability of CEI South's rates and the proliferation of its cost-tracking mechanisms.

Table 1 summarizes the monthly bill for a residential customer using 1,000 kWh for all CEI South current billing charges as of March 2023:

TABLE 1: CEI SOUTH'S CURRENT RATES AND CHARGES⁹	
Description of Charge	Monthly Bill Impact of Residential Customer Using 1,000 kWh/Mo.
Customer Charge	\$10.84
Energy Charge	\$90.26
Fuel Charge	\$38.32
Variable Production Charge	\$4.68
Fuel Adjustment Clause	\$(4.04)
Demand Side Management Adjustment	\$7.39
Environmental Cost Adjustment	\$8.26
Clean Energy Cost Adjustment	\$2.16
MISO Cost and Revenue Adjustment	\$5.41
Reliability Cost and Revenue Adjustment	\$(7.46)
Transmission, Distribution, and Storage System Improvement Charge	\$2.77
Total (Excluding Taxes)	\$158.58

⁸ Jon Webb, *CenterPoint customers paid more for electricity than anyone in Indiana. Here's how much* Evansville Courier & Press (2022), <https://www.courierpress.com/story/money/business/2022/11/07/centerpoint-customers-paid-more-for-electricity-than-anyone-in-indiana/69613576007/> (last visited Mar 27, 2023).

⁹ See OUCC Attachment DJL-1 for all references and calculations.

1 Additionally, Table 2 summarizes the impact of CEI South's recent requests that
 2 are not yet reflected in rates:

TABLE 2: CEI SOUTH'S RECENT CPCN FILINGS AND OTHER RECOVERY REQUESTS			
Cause No.	Pending or Approved	Description of Request	Estimated Monthly Bill Impact (1,000 kWh/mo.)
45564	Approved	CPCN for A.B. Brown Combustion Turbines	\$23.00 ¹⁰
45722	Approved	Securitization	\$(5.00) ¹¹
45754	Approved	CPCN for Pike County Solar Project	\$6.00 ¹²
45795	Pending	CPCN for Federally Mandated Costs	\$2.32 ¹³
45836	Pending	CPCN for New Wind Generation	\$19.86 ¹⁴
45839	Pending	PPA Amendments for the Warrick and Vermillion Projects	\$5.30 ¹⁵
45847	Pending	CPCN for Amendments to the Posey County Solar Build Transfer Agreement (This Cause)	\$12.00 ¹⁶
		Total	\$63.48

3 Looking at the matter from a broader affordability standpoint it is important to pay

¹⁰ Cause No. 45564, Direct Testimony of Matthew A. Rice, p. 41, ll. 14-20. Please note that this is an approximate cost, as CEIS considered the actual residential monthly bill impact to be confidential (Confidential Attachment MAR-7).

¹¹ Cause No. 45722, Direct Testimony of Matthew A. Rice, p. 20.

¹² Cause No. 45754, Direct Testimony of Matthew A. Rice, p. 23, ll. 25-26, through p. 24, ll. 1-5. Please note that this is an approximate cost, as CEIS considered the actual residential monthly bill impact to be Confidential (Confidential Attachment MAR-3). Additionally, the monthly bill impact may increase or decrease depending on CEIS' ability to qualify for tax credits and sell Renewable Energy Credits ("RECs"). (See Settlement Agreement between CEIS, the OUCC, and Citizens' Action Coalition)

¹³ Cause No. 45795, Direct Testimony of Matthew A. Rice, Attachment MAR-4.

¹⁴ Cause No. 45836, Direct Testimony of Matthew A. Rice, Attachment MAR-3.

¹⁵ Cause No. 45839, Direct Testimony of Matthew A. Rice, p. 24, l. 19-26

¹⁶ Cause No. 45847, Direct Testimony of Matthew A. Rice, p. 25, li. 15-30. Please note this does not include REC sales. Additionally, this represents an incremental increase of \$1.00/mo. from the originally-approved BTA in Cause No. 45501.

Material Highlighted in [REDACTED] is CONFIDENTIAL

1 attention to the cumulative rate effects of these cost revisions, as the impacts are
2 not limited to one docket.

3 **Q: How does the Posey County Solar Project compare to other solar projects CEI**
4 **South has negotiated or is considering?**

5 A: In Cause No. 45754, CEI South petitioned the Commission for a CPCN for Pike
6 County Solar Project, which produces 130 MWacs,¹⁷ but has a rate impact of about
7 \$6.00.¹⁸ The cost of the Posey County Project is about [REDACTED] higher on a per MWac¹⁹
8 basis than the Pike County Solar Project. As a larger project, the Posey County
9 Project should realize economies of scale to achieve a better relative price. As
10 discussed in the next section, many of the causes of price increases have stabilized
11 or decreased, so the cost estimate increase is caused by additional owner's costs
12 and pre-work costs, as discussed by my fellow OUCC witnesses.

13 In this proceeding, CEI South has presented Attachment FSB-5
14 (CONFIDENTIAL) - 2022 All Source RFP Results comparing proposals to the
15 Posey County Solar Project. However, in cell F37, CEI South lists the Posey
16 County Solar Project as [REDACTED]
17 in interconnection costs²¹. Interconnection costs brings the price to about [REDACTED]
18 [REDACTED]. When interconnection costs are added, [REDACTED]

¹⁷ Cause No. 45754, petition, p. 1

¹⁸ Cause No. 45754, Direct Testimony of Matthew A. Rice, p. 23, ll. 25-26, through p. 24, ll. 1-5.

¹⁹ OUCC attachment DJL - 2

²⁰ Attachment FSB-5 (CONFIDENTIAL) - 2022 All Source RFP Results

²¹ Bradford Direct, p. 7, Table FSB-1.

Material Highlighted in [REDACTED] is CONFIDENTIAL

1 [REDACTED]. The average is [REDACTED],²² but Posey
2 County Solar Project has a [REDACTED]

IV. MATERIAL PRICE INCREASES

3 **Q: Have Solar Panels experienced supply chain disruptions resulting from**
4 **changes in federal law?**

5 **A:** Yes. Since the beginning of summer 2021, solar panels entering the U.S. have been
6 detained or subjected to additional tariffs. The U.S. Federal Government took these
7 steps due to allegations that Chinese solar panels were made using forced labor.²⁴
8 Furthermore, in March 2022 and April 2022, the Department of Commerce
9 (“DOC”) investigated solar panel imports from Malaysia, Thailand, Vietnam, and
10 Cambodia,²⁵ due to allegations that Chinese solar panels were being resold by those
11 countries. The DOC considered imposing tariffs on solar panels and retroactively
12 applying them to recent solar panel purchases. In June 2022, President Biden
13 prevented the enactment of new tariffs and eased solar panel importation.²⁶

14 **Q: Has the price per peak watt of solar modules entering the U.S. increased?**

15 **A:** Yes. According to the U.S. Energy Information Administration, the price of solar
16 modules in dollars per peak watt decreased until 2021. In July 2021, the price of

²² OUCC attachment DJL – 2

²³ Attachment FSB-5 (CONFIDENTIAL) - 2022 All Source RFP Results

²⁴ Jeanne Whalen, *U.S. begins detaining solar panel imports over concerns about forced labor in China*, The Washington Post (Aug. 27, 2021), <https://www.washingtonpost.com/business/2021/08/27/customs-detains-chinese-solar-panels/> (last visited Nov. 29, 2022).

²⁵ Nichola Groom, *U.S. to consider tariffs on solar panels made in Southeast Asia*, Reuters (March 28, 2022), <https://www.reuters.com/world/asia-pacific/us-trade-officials-consider-tariffs-solar-imports-southeast-asia-2022-03-28/> (last visited Nov. 29, 2022).

²⁶ Kelsey Tamborrino, *Biden moves to ease trade turmoil threatening his solar energy ambitions*, POLITICO (June 6, 2022), <https://www.politico.com/news/2022/06/06/biden-solar-power-equipment-imports-00037359/> (last visited Apr. 3, 2023).

1 solar modules reached an all-time low of \$0.31/watt and then increased to
2 \$0.45/watt in September 2022,²⁷ an increase of approximately 45%.

3 **Q: Did the cost of shipping change between the time CEI South submitted its**
4 **original requests in Cause Nos. 45501 and now?**

5 A: Yes. While shipping costs increased significantly after CEI South submitted its
6 initial request, these costs have since decreased by about two-thirds. In February
7 2021, when Cause No. 45501 was filed, the Shanghai Export Container Freight
8 Index ("SCFI"), which tracks current freight prices for container transport from the
9 main Chinese ports and reports them based on an index set at 1000 on October 16,
10 2009, was at 2775.29. The SCFI peaked in January 2022 at 5094.36, an 83.6%
11 increase from February 2021. However, it has since fallen to 908.35, a 67.3%
12 decrease from the original filing in Cause No. 45501.²⁸

13 **Q: Describe the delay in the Midcontinent Independent System Operator**
14 **("MISO") interconnection queue.**

15 A: Both delays and costs of interconnection have been rising. In 2021, the Lawrence
16 Berkeley National Laboratory measured the typical duration from interconnection
17 request to interconnection agreement as exceeding three years. In that report,
18 Berkeley Lab described the increase in submissions for generator interconnection
19 from 2013 to 2021 as "substantial." Then, in 2022 alone, submissions more than
20 doubled.²⁹

²⁷ U.S. Energy Information Administration - EIA - independent statistics and analysis, EIA (2022), https://www.eia.gov/renewable/monthly/solar_photo/ (last visited Feb. 21, 2023).

²⁸ China-Global & Shanghai Export Container Freight index: High frequency data: Collection, MacroMicro (2023), <https://en.macromicro.me/collections/3208/high-frequency-data/947/commodity-ccfi-scfi> (last visited Mar. 27, 2023).

²⁹ Joseph Rand et al., *Queued Up: Characteristics of Power Plants Seeking Transmission Interconnection* | Electricity Markets and Policy Group (2022), <https://emp.lbl.gov/queues> (last visited Mar. 13, 2023).

1 In addition to delays, the cost of interconnection for solar projects has
2 increased during their time in the queue. "For projects that have completed all
3 required interconnection studies, average costs nearly doubled for more recent
4 projects relative to historical costs from 2000 through 2018. Projects still actively
5 moving through the queue have estimated costs that more than tripled just over the
6 last four years."³⁰ The main driver of this increase has not been at the generation
7 site, but broader network upgrade costs.³¹

8 **Q: Should the Commission approve CEI South's request for the Posey County**
9 **Solar project's increased costs in this proceeding?**

10 A: Yes, in part. While the OUCC agrees the Posey County Solar project is still
11 necessary and is competitive with recent bids CEI South has received in its most
12 recent all-source Request for Proposals, certain project costs are unnecessary or
13 unreasonable.

14 **Q: Should your recommended approval of the Posey County Projects in this**
15 **proceeding be interpreted as a recommendation for approval of other**
16 **purchase power agreements ("PPA") or BTA updates?**

17 A: No. Each PPA or BTA update should be considered both on its individual merits
18 and in the manner it contributes to broader affordability and reliability concerns.
19 The proliferation of additional solar projects and the rising costs related to these
20 projects will continue to raise affordability concerns, as noted above. In addition,

³⁰ Joachim Seel, *Data from MISO Show Rapidly Growing Interconnection Costs* | Electricity Markets and Policy Group (2022), <https://emp.lbl.gov/news/data-miso-show-rapidly-growing> (last visited Mar. 13, 2023).

³¹ Joachim Seel et al., *Generator Interconnection Cost Analysis in the Midcontinent Independent System Operator (MISO) territory*. Electricity Markets and Policy Group (2022), <https://emp.lbl.gov/publications/generator-interconnection-cost> (last visited Mar. 13, 2023).

1 MISO recently proposed substantial changes to its resource accreditation process.³²

2 I urge all stakeholders to take note of this and related ongoing developments as
3 regional transmission operators and independent system operators address new
4 generation sources and their deployments.

5 **Q: What other factors should be considered?**

6 A: The OUCC objects to some of the cost increases but recognizes that unexpected
7 changes have made other increases and the smaller capacity unavoidable. However,
8 the OUCC notes that both CEI South and Arevon are aware of the market risks,
9 including delays in the MISO interconnection process, the DOC investigation's
10 impact on solar panel procurements, and other supply chain issues. The updated
11 BTA price should reflect these risks, and any allowed future project cost increases
12 should be limited.

V. RECOMMENDATIONS

13 **Q: What does the OUCC recommend?**

14 A: The OUCC recommends the Commission approve the updates to the BTA for the
15 Posey County Solar Project, but exclude certain unnecessary and unreasonable
16 costs, as described in Messrs. Latham's and Krieger's testimony, being mindful of
17 additional affordability and reliability concerns as they evolve.

18 **Q: Does this conclude your testimony?**

19 A: Yes.

³² Amanda Durish Cook, *MISO Stakeholders Debate Capacity Accreditation, RA* (March 7, 2023), <https://www.rtoinsider.com/articles/31748-miso-stakeholders-debate-capacity-accreditation-ra> (last visited Mar. 15, 2023).

APPENDIX A

QUALIFICATIONS OF DEREK J. LEADER

1 **Q: Please describe your educational background and experience.**

2 A: I graduated with bachelor's in Economics from Trinity University in San Antonio,
3 Texas, in 2012, and acquired a second bachelor's in Math from Western Governors
4 University out of Salt Lake City, Utah in 2016. I worked as an accountant for
5 Defense Finance and Accounting from May 2011 to August 2011. I was a student
6 trainee at Fort Carson's US Army Dental Activity from July 2012 to September
7 2012. I worked at Rose-Hulman Institute of Technology as a recreation assistant
8 from August 2013 to November 2013.

9 I did my student teaching at Northview High School of Clay County from
10 August to November of 2015. I taught high school math at Shiloh CUSD#1 in
11 Hume, Illinois from August 2016 to July 2017. I taught math, science, and social
12 studies at George W. Julian 57 from August 2017 to July 2018. I taught math and
13 robotics at Woodrow Wilson Middle School from August 2018 to January 2019. I
14 taught math at Marion High School from August 2019 to July 2021. I taught math
15 at Riverton Parke Jr/Sr High School from August 2021 to July 2022.

16 I began my career with the OUCC in August 2022. As part of my continuing
17 education, I have attended the following Michigan State University Institute of
18 Public Utilities seminars: Annual Regulatory Studies Program - Fundamentals
19 Course on August 8-12, 2022, and the Advanced Cost Allocation and Rate Design
20 Course on November 14-17, 2022. I have also taken Fundamentals of Utility Law
21 presented by Scott Hempling and NARUC Regulatory Training Initiative.

Cause No. 45847

OUCCL Attachment DJL-1

Provided electronically as an Excel document.

Cause No. 45847
OUCC Confidential Attachment DJL-2
Provided electronically as an Excel document.

3/27/23, 8:34 AM

CenterPoint customers paid more for electricity than anyone in Indiana

Courier & Press

Cause No. 45847
OUCC Attachment DJL-3
Page 1 of 3

Courier & Press

electricity than anyone in Indiana. Here's how much



Jon Webb

Evansville Courier & Press

Published 4:22 a.m. CT Nov. 7, 2022

EVANSVILLE – For the 12th year in a row, Evansville residents are paying the highest electric bills in the state.

That's according to the Indiana Utility Regulatory Commission's latest residential bill survey, which tracks the July 1 billing period every year for each utility in Indiana.

The 2022 survey found that CenterPoint residential customers using 1,000 kilowatt hours in a month paid \$168.47 on average. That's only \$7 a month more than the closest competitor – Duke Energy – but almost twice as much as the cheapest utility listed – Tipton Municipal Electric, whose customers shelled out \$89.86 on average.

CenterPoint's monthly bill for 1,000 kilowatt hours was about \$40 more than the average across Indiana, the survey found.

That's nothing new for CenterPoint – or, before it, Vectren.

Its electric rates briefly dipped to second-most-expensive in the state in 2010, when the Marshall County REMC's price per 1,000 kilowatt hours outpaced Vectren's by 45 cents (\$133.10 to \$132.65), but Evansville customers have consistently paid the highest bills since then.

Other utilities, though, are catching up.

In the 2013 survey, no other provider was within \$35 of Evansville-area residents' monthly bills. But the 2022 data showed Duke Energy taking a huge leap to get close to CenterPoint.

More: CenterPoint bills have gone up in Evansville-area over last 5 years. Here's how much.

The utility, which serves giant swaths of Southern and Central Indiana, saw an almost 25 percent jump in average monthly bills between 2021 and '22. By comparison, CenterPoint customers saw about a 3 percent hike.

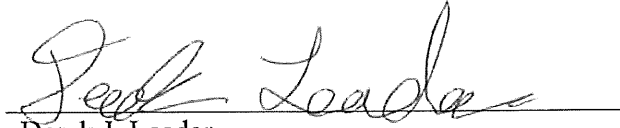
Courier & Press

Many Evansville households saw their heating bills almost double last winter thanks to rising natural gas prices and a 271 percent increase in CenterPoint's "distribution fees."

The company has already warned bills could rise even farther this year. In October, CenterPoint told customers to expect at least a 3.5 percent increase.

AFFIRMATION

I affirm, under the penalties for perjury, that the foregoing representations are true.

A handwritten signature in black ink, appearing to read "Derek J. Leader", is written over a horizontal line.

Derek J. Leader
Utility Analyst II
Indiana Office of Utility Consumer Counselor

Cause No. 45847
CenterPoint Energy

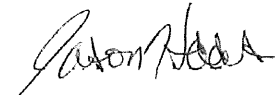
April 5, 2023
Date:

CERTIFICATE OF SERVICE

This is to certify that a copy of the *OUCC's Testimony of Derek J. Leader* has been served upon the following in the captioned proceeding by electronic service on April 5, 2023.

P. Jason Stephenson
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