

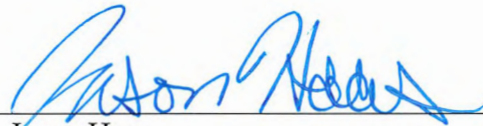
BEFORE THE
INDIANA UTILITY REGULATORY COMMISSION

AMENDED PETITION OF DUKE ENERGY)
INDIANA, LLC SEEKING (1) APPROVAL OF A)
PROPOSED ELECTRIC TRANSPORTATION)
PROGRAM AND AUTHORITY TO DEFER)
RELATED EXPENSES; (2) APPROVAL OF A)
PROPOSED ELECTRIC VEHICLE FAST)
CHARGING (EVFC) TARIFF; AND (3) APPROVAL)
OF A PROPOSED ELECTRIC VEHICLE SERVICE)
EQUIPMENT (EVSE) TARIFF)

CAUSE NO. 45616

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR'S
PUBLIC'S EXHIBIT NO. 1
TESTIMONY OF OUCC WITNESS
JOHN E. HASELDEN

Respectfully submitted,



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

TESTIMONY OF OUCC WITNESS JOHN E. HASELDEN
CAUSE NO. 45616
DUKE ENERGY INDIANA, LLC

I. INTRODUCTION

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

2 A: My name is John E. Haselden. My business address is 115 West Washington Street,
3 Suite 1500 South, Indianapolis, Indiana 46204. I am a Senior Utility Analyst in the
4 Electric Division of the Indiana Office of Utility Consumer Counselor ("OUCC").
5 I describe my educational background, professional work experience, and
6 preparation for this filing in Appendix A to my testimony.

7 **Q: Have you previously testified before the Indiana Utility Regulatory**
8 **Commission ("Commission")?**

9 A: Yes. I have testified in many proceedings on issues before the Commission,
10 including rate cases, demand side management, renewable energy, environmental
11 trackers, and applications for Certificates of Public Convenience and Necessity.

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

13 A: I discuss Duke Energy Indiana's ("DEI" or "Petitioner") request for recovery of
14 costs associated with the proposed Electric Transportation Program ("ET
15 Program"). I also discuss DEI's request for approval of an Electric Vehicle Fast
16 Charging ("EVFC") Tariff and an Electric Vehicle Service Equipment ("EVSE")
17 Tariff.

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

20 A: I reviewed the Verified Petition, Direct Testimony and Exhibits DEI submitted in
21 this Cause. I drafted data requests ("DRs") and reviewed DEI's responses. I

1 reviewed relevant sections of H.R 3684, the Infrastructure Investment and Jobs Act.

2 I also reviewed the Indiana Department of Environmental Management's

3 ("IDEM") Request for Proposals ("RFP") for statewide fast chargers¹ and the

4 application by the Indiana Utility Group ("IUG").²

5 **Q: Are you sponsoring any attachments in this proceeding?**

6 A: Yes. I sponsor:

7 • Attachment JEH-1 to this testimony, which contains Petitioner's responses
8 to selected OUCC DRs;

9 • Attachment JEH-2 to this testimony, which is the RFP IDEM issued for EV
10 charging infrastructure;

11 • Attachment JEH-3 to this testimony, which contains Memorandum of
12 Understanding for the Regional Electric Vehicle Midwest Coalition.

13 **Q: To the extent you do not address a specific item in your testimony, should it be
14 construed to mean you agree with DEI's proposal?**

15 A: No. My silence regarding any topics, issues or items DEI proposes does not indicate
16 my approval of those topics, issues, or items. Rather, the scope of my testimony is
17 limited to the specific items addressed herein.

II. DEI'S PROPOSED ET PROGRAM

18 **Q: What is included in the proposed ET Program?**

19 A: DEI is proposing six programs:

20 1. Residential Electric Vehicle ("EV") Incentive;

21 2. Commercial EV Charging Incentive;

22 3. Electric School Bus;

23 4. Electric Transit Vehicle;

24 5. Fleet Advisory; and

25 6. Education and Outreach.

¹ See Attachment JEH-2.

² The Indiana Utility Group includes Duke Energy Indiana, Hoosier Energy REC, Inc. Indiana Michigan Power, Indianapolis Power & Light Company, Northern Indiana Public Service Company, Vectren, a CenterPoint Energy Company, and Wabash Valley Power Alliance.

1 The programs are budgeted to cost \$4.3 million over two years. DEI witness
2 Cormack C. Gordon explains the programs in more detail and discusses the
3 Commission's denial of several of these programs when previously proposed in
4 Cause No. 45253 S2. Mr. Gordon describes the development of the program after
5 the final order in Cause No. 45253 S2 was issued, which included collaborative
6 meetings with interested stakeholders. DEI attempted to modify the proposed
7 programs in light of the Commission's criticisms and comments. However, recent
8 events have overtaken this process to make four of DEI's proposed pilot programs
9 unnecessary or redundant.

10 **Q: Please explain the events which have occurred to make the proposed programs**
11 **unnecessary.**

12 A: Recent grants IDEM awarded for Electric School Buses, Transit vehicles, and EV
13 Education and Outreach make the proposed programs duplicative and unnecessary.
14 Further, H.R 3684, the Infrastructure Investment and Jobs Act, was signed into law
15 on November 10, 2021, and will make large amounts of federal funding available
16 for EVs such as transit, school buses, EV research (including vehicle-to-grid) and
17 EV charging infrastructure. Consequently, DEI's proposed activities in these areas
18 will be small and duplicative of both the much larger federal and state efforts. In
19 addition, DEI's programs are not cost effective, having ratepayer impact
20 measurement ("RIM") scores of less than 1.0.³

21 **Q: Did you personally participate in any of the collaborative meetings?**

³ Petitioner's Exhibit 1-B (CCG).

1 A: Yes. I participated in several of the later meetings.⁴ Mr. Gordon did not participate
2 in any of the meetings.⁵

3 **Q: What were the OUCC's recommendations concerning the proposed ET**
4 **Program in the collaborative process?**

5 A: In the April 15, 2021 meeting, the OUCC recommended to DEI and the other
6 stakeholders that the Residential and Commercial EV Charging programs be
7 retained, and the remainder of the programs not go forward. This remains the
8 OUCC's position. The OUCC does not oppose the rollout of EVs. However, the
9 costs of the majority of the proposed programs are experimental, unnecessary, and
10 inappropriate to be recovered from ratepayers. In addition, ratepayers would bear
11 all the risks of these experimental programs and most benefits (increased sales) will
12 inure to DEI and its shareholders.

13 **Q: Please explain the OUCC's recommendations concerning Residential and**
14 **Commercial EV Charging programs.**

15 A: As proposed, the Residential and Commercial EV Charging programs may yield
16 information about customer charging patterns and the influence of incentives on
17 off-peak charging. Missing from the pilot is a study demonstrating how a demand
18 response program might mitigate adverse impacts to the system. Level 2 chargers
19 can draw up to 20 kW of power and it is important to understand how these possibly
20 numerous and significant loads can be controlled to minimize impact to the
21 Transmission and Distribution ("T&D") system. The OUCC recommends adding a

⁴ January 11, 2021, February 15, 2021, and April 15, 2021.

⁵ Attachment JEH-1, Response to OUCC DR 1-1.

1 demand response group or subgroup to the Residential and Commercial EV
2 Charging pilot programs.

3 **Q: Please explain the OUCC's recommendations concerning the proposed**
4 **Electric School Bus program.**

5 A: The program DEI proposes is unnecessary and redundant to other grants awarded
6 at the state and federal level. IDEM awarded grants for four electric school buses,
7 one electric transit bus and two short-haul/drayage vehicles on September 14,
8 2021.⁶ Further, the Infrastructure Investment and Jobs Act designated \$5 billion for
9 the zero-emission (electric) school buses⁷ and another approximately \$1 billion for
10 buses and bus facilities.⁸ Indiana's expected share of these amounts is \$100 million
11 and \$20 million, respectively; however, it is not known how these funds will be
12 administered at this time.

13 **Q: Please discuss the value of the Vehicle to Grid ("V2G") in the proposed school**
14 **bus program.**

15 A: DEI represents the value of the V2G benefit in the proposed school bus program
16 will result in \$413,731 of benefits.⁹ This value of is overstated because DEI
17 assumed system T&D capacity cost savings when there are none.¹⁰ These proposed
18 installations will have no effect on the capacity of DEI's T&D system, other than
19 to *increase* the load on the specific circuits on which they are located. Therefore,
20 there would not be any T&D capacity savings from this program, only increased

⁶ See https://www.in.gov/idem/airquality/files/vw_trust_20210914_presentation.pdf. Grant amounts totaled \$1,179,778 for the electric school buses (p. 19), \$666,604 for the electric transit buses, and \$507,724 for the short haul/drayage projects, for a total grant of \$2,354,106.

⁷ See HR 3684, Division G, Title XI – Clean School Buses and Ferries.

⁸ HR 3684, Division C - Transit, Section 30018.

⁹ Petitioner's Exhibit 1-B (CCG).

¹⁰ Attachment JEH-1, response to OUCC DR 3.4 (b).

1 costs. This correction would reduce the benefits by approximately half and render
2 the program and portfolio even less cost effective. DEI is already involved in a V2G
3 research project with Bartholomew Consolidated School Corporation¹¹ and, as
4 noted above, IDEM awarded grants to fund four electric school buses. In addition,
5 the Infrastructure Investment and Jobs Act designates funds for research on V2G.
6 Further research by DEI on this topic is unnecessary and redundant. This work will
7 be accomplished in a larger and more comprehensive manner by other participants
8 in the IDEM grants and federal programs.

9 **Q: Please explain the OUCC's recommendations concerning the proposed**
10 **Transit Bus program.**

11 A: The Transit Bus program is not cost effective under the Ratepayer Impact
12 Measurement ("RIM") test¹² and the customer incentive is not adequate to induce
13 participation. Increasing the incentive would further decrease cost effectiveness.
14 Additionally, the proposed DEI pilot should be denied in view of the large amount
15 of funding provided at the state and federal levels which renders the proposed pilot
16 redundant and unnecessary, as with the proposed school bus program.

17 **Q: Please explain the OUCC's recommendations concerning the Fleet Advisory**
18 **and Education and Outreach programs.**

19 A: The Fleet advisory program is a load-building marketing effort and should be
20 denied. On September 14, 2021,¹³ IDEM recently awarded an \$800,000 grant to
21 South Shore Clean Cities for statewide education, outreach, and marketing of
22 electric vehicles. Therefore, the Education and Outreach program DEI proposes

¹¹ Attachment JEH-1, Responses to OUCC DR 1.8(c) and 3.1.

¹² Petitioner's Exhibit 1-B (CCG).

¹³ https://www.in.gov/idem/airquality/files/vw_trust_20210914_presentation.pdf

1 would be redundant and unnecessary, and this proposed program should also be
2 denied.

3 **Q: Please comment on the results of the RIM test DEI calculated.**

4 A: As shown on Table 1 on page 10 of Mr. Gordon's direct testimony, DEI calculated
5 an \$89,630 net present value of benefits for the portfolio under the RIM test.
6 However, one of the problems with this calculation is the assumption that higher
7 kWh sales will benefit all customers prior to the implementation of new rates in the
8 next rate case. This is incorrect. The benefit of increased sales prior to
9 implementing new rates will accrue solely to DEI through increased contribution
10 to fixed costs and profits via the increased sales. Increased kWh sales prior to DEI's
11 next rate case will not benefit other customers. Given the slim margin of the net
12 present value ("NPV") of benefits taken over 10 or 12 years,¹⁴ removing the first
13 few years of increased sales revenue until DEI's next rate case would drive the NPV
14 of benefits for the entire portfolio negative under the RIM test. However, removing
15 non-cost-effective programs (Electric school Bus, Electric Transit, Fleet Advisory,
16 and Education and Outreach) may result in a cost-effective portfolio.

III. DEI'S PROPOSED EVFC AND EVSE TARIFFS

17 **Q: What is DEI proposing regarding EVFC pricing?**

18 A: DEI proposes charging \$0.342505/kWh to users for its publicly available EVFCs.¹⁵
19 This price is based upon an average of inferred prices of 11 public fast chargers
20 located in Indiana.¹⁶ DEI proposes adjusting the price pursuant to changes in

¹⁴ Attachment JEH-1, Response to OUCC DR 3.4.

¹⁵ Petitioner's Exhibit No. 3, Direct Testimony of Roger A. Flick, II, page 2, line 19 through page 3, line 3.

¹⁶ Flick Direct, page 6, line 14, and Workpaper EVFC, page 2 of 2.

1 average pricing at these locations. More price points will be added as they become
2 available.¹⁷ DEI is planning to apply the pricing to its share of EVFCs associated
3 with future EVFCs constructed as part of the funding award pursuant to IDEM's
4 administration of grant funding from the VW Trust Fund.¹⁸ As part of the IUG, DEI
5 was awarded a share of grant money in the amount of \$1,633,284 to offset the costs
6 of 18 EVFC stations in DEI territory.¹⁹

7 **Q: Does the OUCC agree with this price adjustment methodology?**

8 A: No. The pricing is not based upon a foundation of DEI's cost of providing this
9 service. It is unknown how the other EVFC stations determine their pricing, and
10 the pricing should not be used as a basis for determining DEI's pricing.

11 **Q: What is DEI requesting in this proceeding regarding its participation in the**
12 **Crossroads project?**

13 A: DEI is not requesting cost recovery for its participation in the Crossroads project in
14 this proceeding. However, DEI estimates it will invest \$4,500,000 in EV
15 Crossroads, which is offset by \$1,633,284 of IDEM grant funding, for a \$2,866,716
16 net investment. The pricing DEI proposes is not related to the levelized cost of
17 DEI's portion of the EVFCs in the Crossroads project nor ongoing operations and
18 maintenance costs. When asked in OUCC DR 2.8 how DEI proposes to recover
19 capital fuel cost and maintenance expenses for the fast chargers not covered by
20 EVFC tariff revenues, it replied fuel costs would be covered by the EVFC tariff.²⁰

¹⁷ Attachment JEH-1, Reply to OUCC DR 2.6 (a).

¹⁸ https://www.in.gov/idem/airquality/files/vw_trust_20210520_presentation.pdf

¹⁹ Attachment JEH-1, Response to OUCC DR 2-7

²⁰ Attachment JEH-1, Response to OUCC DR 2.8.

1 DEI also stated it "...is not requesting approval for cost recovery of the stations *at*
2 *this time*" (emphasis added).²¹

3 **Q: Do you have other concerns about the EVFC pricing methodology?**

4 A: Yes, the method of determining the price DEI proposed is not a reasonable or
5 relevant method. The referenced prices range from \$.07/kWh to \$0.66/kWh and
6 vary by operating company. Additionally, the sample size is extremely small. It is
7 likely, from the low costs of many of the data points, the host companies are
8 subsidizing some or all of the installation and/or operating costs. The result is a
9 distorted and subsidized range of pricing whose average value is meaningless, and
10 not a reasonable range of market prices.

11 **Q: Are there other issues with the EVFC Tariff proposal?**

12 A: Yes, the Infrastructure Investment and Jobs Act designated \$5 billion for Direct
13 Current Fast Charging systems and another \$2.5 billion for other charging systems.
14 It remains to be seen how the federal funding will be administered in Indiana. It
15 may no longer be reasonable to advance the IUG's proposal for implementing
16 EVFCs with funds partially supplied from the Volkswagen Trust Fund ("VW Trust
17 Fund"). Among other objectives, the creation of the Regional Electric Vehicle
18 Midwest Coalition ("REV Midwest") is intended to develop a common customer
19 experience across state lines.²² Contrary to the stated REV Midwest goal, allowing
20 individual utilities to own and operate portions of the fast-charging network may

²¹ Attachment JEH-1, Response to OUCC DR 2.7 (c).

²² Attachment JEH-3.

1 create a hodgepodge of pricing, payment methods and charging systems. It is
2 premature for the Commission to begin approving such tariffs.

3 **Q: What is the OUCC's recommendation regarding the proposed EVFC tariff?**

4 A: DEI's request for the proposed EVFC tariff should be denied. It has neither a
5 reasonable foundation as cost-based nor market-based. It is premature to set a price
6 for EVFCs that do not exist and whose operating or financial structure is unknown.
7 The large amount of federal funding for EVFCs, coupled with the REV Midwest
8 coordination, will have a substantial effect on what development of EVFCs and
9 pricing will be.

10 **Q: Do you have any concerns with proposed the EVSE tariff?**

11 A: No. This is a voluntary tariff that would only be paid by participating customers.
12 No additional funding is requested for this program, and it should not affect non-
13 participating customers.

IV. OUCC RECOMMENDATIONS

14 **Q: Please summarize the OUCC's recommendations about DEI's customers**
15 **funding the ET programs?**

16 A: Following are the OUCC's recommendations:

- 17 1. The Residential and Commercial EV Charging Programs may have benefit for
18 future program design but should additionally incorporate demand response
19 offerings.
- 20 2. The Electric School Bus, Electric Transit Vehicle, and Education and Outreach
21 programs are not necessary in view of recent developments previously
22 discussed. The Fleet Advisory program is a load building marketing program

1 not necessary to the provision of electric service. These four programs should
2 be denied.

3 3. The proposed EVFC tariff should be denied.

4 4. The proposed EVSE Tariff is acceptable and should be approved. This is a
5 voluntary tariff paid for by subscribing customers.

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

7 A: Yes.

APPENDIX TO TESTIMONY OF
OUCC WITNESS JOHN E. HASELDEN

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

2 A: I am a graduate of Purdue University with a Bachelor of Science degree in Civil
3 Engineering. I am also a graduate of Indiana University with the degree of Master of
4 Business Administration, majoring in Finance. I am a registered Professional Engineer in
5 the State of Indiana. I have attended and presented at numerous seminars and conferences
6 on topics related to demand-side management (“DSM”) and renewable energy.

7 **Q: Please describe your utility business experience.**

8 A: I began employment with Indianapolis Power & Light Company in April, 1982 as a Design
9 Project Engineer in the Mechanical-Civil Design Engineering Department. I was
10 responsible for a wide variety of power plant projects from budget and cost estimation
11 through the preparation of drawings, specifications, purchasing and construction
12 supervision.

13 In 1987, I became a Senior Engineer in the Power Production Planning Department.
14 I was responsible for assisting and conducting studies concerning future generation
15 resources, economic evaluations, and other studies.

16 In 1989, I was promoted to Division Supervisor of Fuel Supply and in 1990, became
17 Director of Fuel Supply. I was responsible for the procurement of the various fuels used at
18 IPL’s generating stations.

19 In 1993, I became Director of Demand-Side Management. I was responsible for the
20 development, research, implementation, monitoring, and evaluation of all marketing and

1 DSM programs. In particular, I was responsible for the start-up of this new department and
2 for the start-up and implementation of the DSM programs approved by the Commission in
3 its Order in Cause 39672 dated September 8, 1993. The DSM Department was dissolved
4 at IPL in 1997 and I left the company.

5 From 1997 until May, 2006, I held the positions of Director of Marketing and later,
6 Director of Industrial Development and Engineering Services at The Indiana Rail Road
7 Company. I was responsible for the negotiation of coal transportation contracts with several
8 electric utilities, supervision of the Maintenance-of-Way and Communications and Signals
9 departments, project engineering, and development of large capital projects.

10 I rejoined IPL in May, 2006 as a Principal Engineer in the Regulatory Affairs Department.
11 I was responsible for the evaluation and economic analysis of DSM programs and assisted
12 in the planning and evaluation of environmental compliance options and procurement of
13 renewable resources.

14 In May, 2018, I joined the OUCC as a Senior Utility Analyst - Engineer. I review
15 and analyze utilities' requests and file recommendations on behalf of consumers in utility
16 proceedings. As applicable to a case, my duties may also include evaluating rate design
17 and tariffs, examining books and records, inspecting facilities, and preparing various
18 studies.

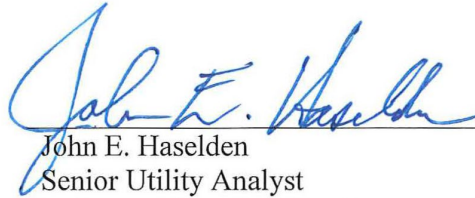
19 **Q: Have you previously testified before the Indiana Utility Regulatory Commission?**

20 A: Yes. I have provided testimony in several proceedings on behalf of IPL regarding the
21 subjects of Fuel Supply, DSM and renewable energy most recently in Cause Nos. 43485,
22 43623, 43960, 43740, 44328, 44018, and 44339. My testimony on DSM concentrated on

1 the evaluation, measurement and verification (“EM&V”) of DSM programs. My
2 testimony on renewable energy concentrated on IPL’s Rate REP (feed-in tariff, wind
3 power purchase agreements and solar energy. I have provided testimony on behalf of the
4 OUCC in Cause Nos. 43955 (DSM-7 and 8), 43827 (DSM-8 and 9), 43623 (DSM-19),
5 43405 (DSMA-17), 45086, 45145, 45193, 45194, 45235, 45245, 45253, 45285, 45370,
6 45387, 45465, 45485, 44733 (TDSIC-5, 7 and 8), 44910 (TDSIC-4, 6, 7, 8, and 9),
7 45576, and 45506.

AFFIRMATION

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



John E. Haselden
Senior Utility Analyst
Indiana Office of Utility Consumer Counselor

Cause No. 45616
Duke Energy Indiana, LLC

Date: January 6, 2022

OUCC
IURC Cause No. 45616
Data Request Set No. 1
Received: October 15, 2021

OUCC 1.1

Request:

Referencing the testimony of Cormack C. Gordon:
Page 4, line 13 through page 5: Did Mr. Gordon participate in any of the collaborative stakeholder meetings? If yes, which meetings?

Response:

Mr. Gordon did not participate personally in the collaborative stakeholder meetings given that he assumed his current role of Director of Transportation Electrification (“TE”) in May of 2021 as described on Page 2, lines 4-5 of testimony. The collaborative stakeholder meetings were led by TE team program subject matter experts and other Duke Energy personnel.

OUCC
IURC Cause No. 45616
Data Request Set No. 1
Received: October 15, 2021

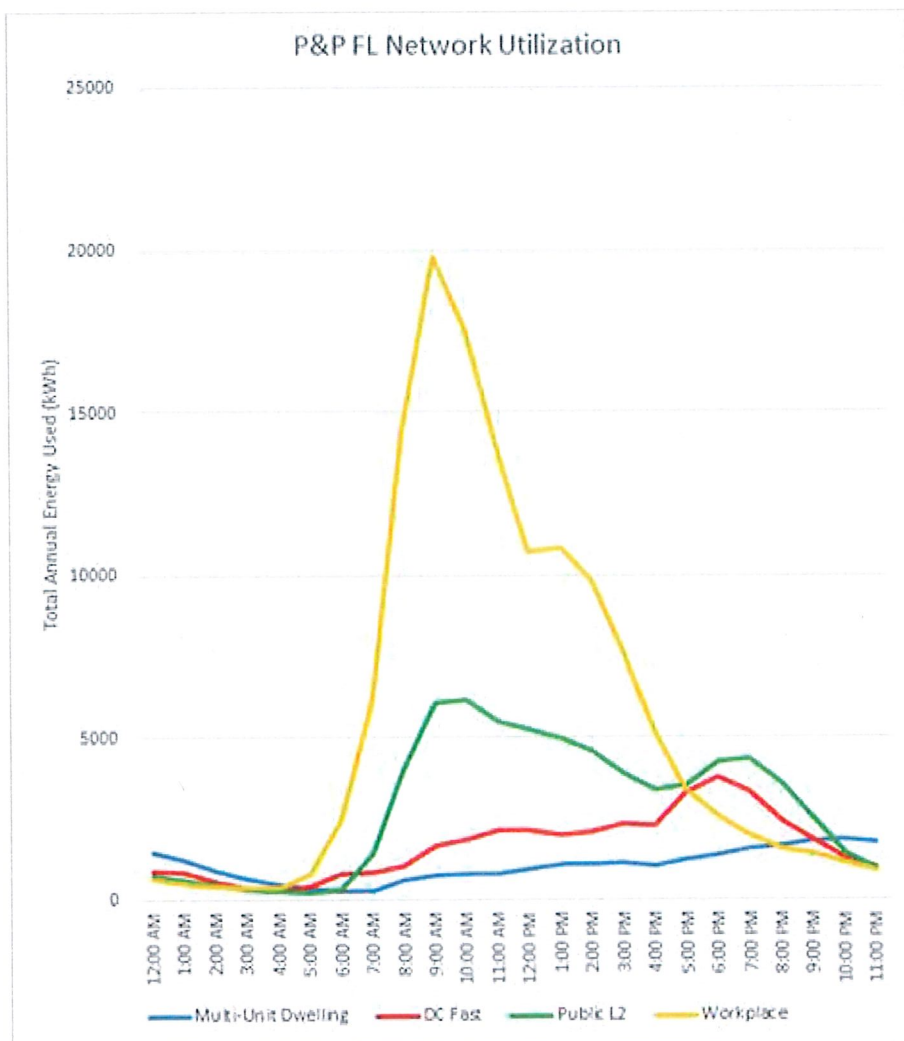
OUCC 1.3

Request:

Referencing the testimony of Cormack C. Gordon:
Page 9, line 5. Please provide the “program load curves.”

Response:

The following load curves from a 2019 Duke Energy Florida pilot were used in reference to page 9, line 5 “program load curves.”



OUCC
IURC Cause No. 45616
Data Request Set No. 1
Received: October 15, 2021

OUCC 1.5

Request:

Referencing the testimony of Cormack C. Gordon:

Page 9, lines 10 – 11: Please provide the utility supply-side assumptions by year:

- a. Cost of energy per kWh;
- b. Cost of generating capacity in kW-year;
- c. Cost of T&D capacity in kW-year
- d. Percentage of capacity losses;
- e. Percentage of energy losses;
- f. Discount rate;
- g. Evaluation period

Response:

Please reference Confidential Workpaper CCG-1, tab “Confidential Utility Inputs” for these assumptions.

OUCC
IURC Cause No. 45616
Data Request Set No. 1
Received: October 15, 2021

OUCC 1.6

Request:

Referencing the testimony of Cormack C. Gordon:

Regarding the Residential EV Charging Incentive Program:

- a. Page 13, lines 3-5: This group appears to be the status quo. Why is DEI proposing to pay an incentive to this group?
- b. Did DEI consider a demand response (interruptible charging) program? If yes, why was it not proposed? If no, why was it not considered?
- c. Will DEI separately meter the EVSE? If yes, will the meters be read through the AMI?
- d. Why are PHEVs included in the proposed pilot?
- e. Page 13, lines 17-19: How will DEI handle solar net metering customers?
- f. Are there participation targets set for low-income customers?

Objection:

Duke Energy Indiana objects to this request on the basis that it is vague, ambiguous, and not reasonably calculated to lead to the discovery of admissible evidence. The term "status quo" is not defined or reasonably limited in scope.

Response:

Subject to and without waiving or limiting its objections, Duke Energy Indiana responds as follows:

- a. In the absence of an incentive, there is no means by which to recruit these customers to participate. The referenced baseline group provides for a control group. Additionally, the baseline group will be required to charge as frequently as the other two groups.
- b. Duke Energy Indiana considered a demand response component to this and other programs but noted that this would impose additional costs on participants by ensuring EVSE hardware was networked. The Company believes demand response programs will be valuable as the potential for curtailment is better understood.
- c. No. Duke Energy Indiana will not separately meter the residential EVSE that the customer chooses to install. This would add unnecessary cost to the customer and program. Duke Energy Indiana plans to use some combination of AMI-based EV

charging load identification, on-board vehicle telematics, and other technology platforms to gather data.

- d. PHEVs were included in this program as there are several top-selling models in Indiana that are capable of providing thirty miles of electric range on a charge. Thirty miles of driving daily is on par with the average American daily commute and was therefore the value we utilized when calculating RIM, PCT, and TRC program results.
- e. Solar net metering and future EDG customers are expected to be eligible for participation in this program.
- f. No low-income participation targets have been set for this residential program. Program low-income considerations were included in the Commercial Program.

OUCC
IURC Cause No. 45616
Data Request Set No. 1
Received: October 15, 2021

OUCC 1.7

Request:

Referencing the testimony of Cormack C. Gordon:

Regarding the Commercial EV Charging Incentive Program:

- a. Page 17, lines 18 – 21: Who pays for the installation and maintenance of EVSEs located at:
 - i. “Parks”;
 - ii. “Downtown parking”;
 - iii. “Businesses open to the public”;
 - iv. “Other general public parking locations”;
 - v. “Public or private workplace locations”;
 - vi. “Multi-unit dwelling locations”; and
 - vii. Low-income multi-unit dwelling locations.
- b. Will there be a price charged for these publicly accessible Level 2 charging locations?
 - i. By the charge?
 - ii. By kWh?
 - iii. If there is a rate, who will administer the collection of revenue from these public sites?
- c. How will DEI discern whether the vehicle charged was a BEV or PHEV?

Response:

- a. The customer, which owns the charging stations in question, will be responsible for installation and maintenance costs of the stations they install.
- b. The customer, which owns the charging stations in question, decides the fee structure to be assessed to EV drivers.
- c. Duke Energy Indiana will not discern between BEV and PHEV, nor was this intended in program design. Program intent is to establish a load curve for the incentivized segments.

OUCC
IURC Cause No. 45616
Data Request Set No. 1
Received: October 15, 2021

OUCC 1.8

Request:

Referencing the testimony of Cormack C. Gordon:
Regarding the Electric School Bus Program:

- a. Page 20, lines 7-10:
 - i. Why does Duke retain ownership rights to the battery?
 - ii. What is the expected useful life of the bus?
- b. Page 22, lines 6-9: If the school bus were to discharge at 50kW:
 - i. How long can a constant 50 kW be discharged?
 - ii. If fully discharged, what is the time necessary to fully recharge the battery?
- c. Page 22, line 4:
 - i. How many school systems are represented by the four all-electric busses?
 - ii. What are the names of the school systems?
 - iii. Do the referenced busses utilize Level 2 chargers? If not, what type of EVSE is used?
 - iv. Are the busses used in all weather?
 - v. Are the referenced busses used every school day?
 - vi. What restrictions are on the referenced busses use?
 - vii. Do the referenced school systems maintain back-up school busses for the all-electric busses?
- d. Page 21, lines 14 – 17: There appears to be a conflict between times of school bus usage and DEI seasonal system peak demands. How will DEI resolve such conflicts?
- e. Page 21, lines 18 – 20: Please provide a copy of the Electric Vehicle School Bus Supply Equipment Site Agreement.
- f. What is the minimum number of participant school busses commitments required before the program will proceed?

Objection:

Duke Energy Indiana objects to this request on the basis that it is vague, ambiguous, overly broad, and not reasonably calculated to lead to the discovery of admissible evidence. In addition, Duke Energy Indiana objects to this request on the grounds that it seeks information that is not solely within the possession or knowledge of the Company.

Response:

Subject to and without waiving or limiting its objection, Duke Energy Indiana responds as follows:

- a.
 - i. The Company retains ownership rights to the battery for the ability to repurpose it for a future application as the bus (chassis) is retired.
 - ii. The average bus life in Indiana is approximately 12 years.
- b.
 - i. In theory, a 200kWh battery pack would discharge in four hours at 50kW. However, discharging a battery pack is not that simplistic. The intent of this program is to study the impacts of various discharge scenarios within customer parameters.
 - ii. In theory, a 200kWh battery pack that is completely discharged would take 4-5 hours to recharge at 50kW input. It is not Duke Energy Indiana's intent to fully discharge a bus battery, but instead to consider parameters as well as leverage the bus' on-board battery management system to manage battery health.
- c.
 - i. There are four different school systems of which the Company is aware that each have an electric bus in service currently.
 - ii. The schools are Monroe County Community School Corporation, Delphi Community School Corporation, Carmel Clay School Corporation, and Bartholomew Consolidated School Corporation.
 - iii. It is our understanding that the customers are mainly using level 2 units, but one customer has installed a DC Fast Charger as they are expecting two more electric buses. This DCFC will allow them to fully recharge their 3 buses overnight. Furthermore, as stated in lines 13-17 of referenced testimony, the Company is also installing a bi-directional fast charger for Bartholomew Consolidated School Corporation as part of a research agreement.
 - iv. See objection. It is our understanding that all buses are used in all weather, but such use case decisions are the prerogative of the bus-operating school district.
 - v. See objection. This Program intends to gather this data.
 - vi. See objection. This Program intends to gather this data.
 - vii. See objection. This Program intends to gather this data.
- d. School buses are not commonly operated during summer peak times, nor are they used on the weekends. Duke Energy Indiana does not intend nor expect to attempt battery discharge during normal times of bus operation. However, there are many charging and discharging scenarios that can be researched with this program

depending how school customers use their buses and set different parameters for charging and discharging.

- e. Please see Attachment OUCC 1.8-A for the draft Site Host Agreement. This is subject to change.
- f. The Program will proceed as outlined by the Commission's final order in this Cause. There is no minimum number of vehicle commitments. However, individual customer program participation is limited to two busses.

OUCC
IURC Cause No. 45616
Data Request Set No. 1
Received: October 15, 2021

OUCC 1.10

Request:

Referencing the testimony of Cormack C. Gordon:

Regarding Exhibit 1-B (CCG), Rate Impact Measure Test box:

- a. Was DSMore used to generate the results? If yes, by whom?
- b. For the Residential EV Charging Incentive Program:
 - i. Please provide the calculations and assumptions supporting the Increased Utility Revenue values listed.
 - ii. Please provide the calculations and assumptions supporting the Increased Supply-side Costs values listed.
- c. For the Commercial EV Charging Incentive Program:
 - i. Please provide the calculations and assumptions supporting the Increased Utility Revenue values listed.
 - ii. Please provide the calculations and assumptions supporting the Increased Supply-side Costs values listed.
- d. For the School Bus Program:
 - i. Please provide the calculations and assumptions supporting the Increased Utility Revenue values listed.
 - ii. Please provide the calculations and assumptions supporting the Increased Supply-side Costs values listed.
 - iii. Please provide the calculations and assumptions supporting the V2G value.
- e. For the Transit Bus Program:
 - i. Please provide the calculations and assumptions supporting the Increased Utility Revenue values listed.
 - ii. Please provide the calculations and assumptions supporting the Increased Supply-side Costs values listed.
- f. For the Fleet advisory Service Program:
 - i. Please provide the calculations and assumptions supporting the Increased Utility Revenue values listed.
 - ii. Please provide the calculations and assumptions supporting the Increased Supply-side Costs values listed.

Objection:

Duke Energy Indiana objects to this request as to the term “by whom” as vague, ambiguous, overly broad and unduly burdensome.

Response:

Subject to and without waiving or limiting its objections, Duke Energy Indiana responds as follows:

- a. Yes. See objection.
- b. The following responses cover items b through f.
 - i. Please reference Confidential Workpaper CCG-1, tab “Confidential Utility Inputs,” which contains all the requested information.
 - ii. Please reference Confidential Workpaper CCG-1, tab “Confidential Utility Inputs,” which contains all the requested information.

OUCC
IURC Cause No. 45616
Data Request Set No. 2
Received: November 2, 2021

OUCC 2.2

Request:

Will DEI operate and maintain all of the fast-charging stations with DEI company personnel?

Response:

Duke Energy Indiana will operate and maintain the fast-charging stations with a combination of 3rd party contractors and Company personnel.

Witness: Cory Gordon

OUCC
IURC Cause No. 45616
Data Request Set No. 2
Received: November 2, 2021

OUCC 2.4

Request:

Does DEI currently have a system in place to process payments made by users of the proposed fast chargers?

Response:

Following industry best practices, Duke Energy Indiana is contracting with an EV charge networking services provider to process payments made by users of the Duke Energy Indiana owned fast charging sites.

Witness: Cory Gordon

OUCC
IURC Cause No. 45616
Data Request Set No. 2
Received: November 2, 2021

OUCC 2.5

Request:

Referencing Workpaper EVFC-1:

- a. Does DEI know why are prices at EVGo network stations substantially higher than all other locations?
- b. Does DEI know if any of the fast charger stations listed are subsidized? If so, in what way? (For example, received funding to charge reduced rates or received free or discounted equipment or electric system connections.)

Objection:

Duke Energy Indiana objects to this request to the extent it seeks information belonging to third parties and not in the possession of the Company.

Response:

Subject to and without waiving or limiting its objections, and assuming this request is referring to Petitioner's Exhibit 3-B (RAF), Duke Energy Indiana responds as follows:

- a. The calculation in Exhibit 3-B (RAF) included a single session fee. This single session fee is added when the end user does not sign up for a monthly pass.
- b. Duke Energy Indiana is not privy to the exact funding mechanisms or equipment sourcing processes used by the operators of the listed fast charging stations, nor is the Company familiar with any considerations for electric system connections provided by other electric utilities.

Witness: (a) Roger Flick

OUCC
IURC Cause No. 45616
Data Request Set No. 2
Received: November 2, 2021

OUCC 2.6

Request:

Referencing page 5, line 4 through page 6, line 3:

- a. When the other fast charging stations proposed by other members of the Indiana Utility Group are brought online, will their prices be included in the statewide average calculation?
- b. What prices (\$/kWh) are proposed for fast chargers by other members of the Indiana Utility Group?

Objection:

Duke Energy Indiana objects to part b. of this request on the grounds that any “proposed” utility prices are not within the possession of the Company and are subject to antitrust laws. Therefore, the information requested is not relevant to this proceeding and not reasonably calculated to lead to admissible evidence.

Response:

- a. Yes.
- b. See objection.

Witness: Roger Flick (part a. only)

OUCC
IURC Cause No. 45616
Data Request Set No. 2
Received: November 2, 2021

OUCC 2.7

Request:

Referencing page 7, lines 1 through 8: Mr. Flick states, “The Company is proposing to utilize revenues from the EVFC tariff to cover costs associated with station operations (e.g., fuel cost and maintenance) ...”

- a. What is DEI’s kWh sales and revenue estimates, by year, for each of the proposed fast chargers?
- b. What is DEI’s estimated revenue requirement for the capital costs to construct the fast charger stations and utility T&D connection services?
- c. Will any remaining accrued revenues be sufficient to cover any remaining overall costs?

Objection:

Duke Energy Indiana objects to this request to the extent it calls for speculation and seeks a calculation or compilation that has not already been performed and that Duke Energy Indiana objects to performing. In addition, the information sought is neither relevant nor admissible as it is beyond the scope of Duke Energy Indiana’s case-in-chief testimony.

Response:

Subject to and without waiving or limiting its objections, Duke Energy Indiana responds as follows;

- a. See objection.
- b. See objection. Answering further, Duke Energy Indiana is budgeting an all-in capital cost of \$250,000 for each location, with the IDEM VW award covering \$90,738¹ coming to an expected \$159,262 capital investment per location. The Fast Charge fee is proposed based on statewide average, not necessarily the cost of service to operate the charging stations.
- c. See objection. Duke Energy Indiana is not requesting approval for cost recovery of the stations at this time.

Witness: Roger Flick

¹ IDEM Statewide DCFC Award Announcement. Slide 11.
https://www.in.gov/idem/airquality/files/vw_trust_20210520_presentation.pdf

OUCC
IURC Cause No. 45616
Data Request Set No. 2
Received: November 2, 2021

OUCC 2.8

Request:

How does DEI propose to recover capital, fuel cost, and maintenance expenses for the fast charger stations not recovered through revenues?

Objection:

Duke Energy Indiana objects to this request as it is beyond the scope of Duke Energy Indiana's case-in-chief testimony; further, it is not reasonably calculated to lead to the discovery of admissible evidence.

Response:

Subject to and without waiving or limiting its objections, Duke Energy Indiana responds as follows: Fuel costs will be covered by the proposed EVFC tariff.

Witness: Roger Flick

OUCC
IURC Cause No. 45616
Data Request Set No. 2
Received: November 2, 2021

OUCC 2.9

Request:

Did DEI condition its proposal to IDEM as contingent upon recovering costs from its ratepayers for total costs not covered by user revenues?

Objection:

Duke Energy Indiana objects to this request as the information sought is neither relevant nor admissible as it is beyond the scope of Duke Energy Indiana's case-in-chief testimony; further, it is not reasonably calculated to lead to the discovery of admissible evidence.

Response:

Subject to and without waiving or limiting its objections, no.

OUCC
IURC Cause No. 45616
Data Request Set No. 2
Received: November 2, 2021

OUCC 2.10

Request:

Did IDEM set a minimum or maximum price DEI can charge at the fast chargers?

Response:

No.

OUCC
IURC Cause No. 45616
Data Request Set No. 3
Received: November 16, 2021

OUCC 3.1

Request:

Referencing DEI's response to OUCC DR 1.8 (c) (iii) regarding the Bartholomew Consolidate School Corporation's bi-directional fast charger installation:

- a. Is DEI seeking cost recovery of this installation and research study as part of this proceeding?
- b. When is the installation expected to be completed?
- c. What is the expected cost of the installation and research?
- d. Will this vehicle-to-grid research compromise or void the battery warranty?

Objection:

Duke Energy Indiana objects to this request as the information sought is neither relevant nor admissible as it is beyond the scope of Duke Energy Indiana's case-in-chief testimony. Duke Energy Indiana further objects to the extent the request seeks information belonging to third parties and not in the possession of the Company.

Response:

Subject to and without waiving or limiting its objections, Duke Energy Indiana responds as follows:

- a. Not in this proceeding.
- b. See objection.
- c. See objection.
- d. See objection. Duke Energy Indiana is not in possession of the Customer's warranty information.

OUCC
IURC Cause No. 45616
Data Request Set No. 3
Received: November 16, 2021

OUCC 3.4

Request:

Referencing Petitioner's Exhibit 1-B(CCG):

- a. Please provide the calculations supporting the value of \$129,013 for the Increased Utility Revenue associated with the Electric School Bus program.
- b. Please provide the calculations supporting the value of \$413,731 for the V2G benefit associated with the Electric School Bus program.
- c. What are the beginning and ending dates used in the NPV analysis for the RIM test?

Response:

- a. Please see Confidential Workpaper CCG-1.
- b. Please see Confidential Workpaper CCG-1.
- c. Please see Confidential Workpaper CCG-1. The start year for the RIM NPV analysis is 2021. The end year depends on the life of each measure, so those measures with a 10-yr life begin in year 2021 and end with year 2030; while those measures with a 12-yr life begin in 2021 and end with year 2032.

Witness: Cory Gordon



AGENCY: INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (IDEM)

TITLE: INDIANA STATEWIDE ELECTRIC VEHICLE CHARGING NETWORK

ACTION: REQUEST FOR PROPOSALS FOR FULL STATEWIDE OR PARTIAL DIRECT-CURRENT FAST CHARGER AND/OR LEVEL 2

DATES: The closing date for receipt of applications is **September 23, 2020, 5:00 p.m. ET**. Indiana will only accept electronic grant applications in response to this RFP. Electronic grant applications must be submitted in Microsoft Word or PDF format to VWTrust@idem.in.gov. Electronic submissions will be considered timely upon receipt, not transmission. An e-mail response confirming receipt of electronic applications will be provided on or before the closing date when possible. Facsimile and late submissions will not be accepted.

SUMMARY: This action announces funding availability for projects focused on improving Indiana's statewide electric vehicle (EV) charging network. Funds will be available for both direct-current fast charge (DCFC) and Level 2 (L2) equipment. These proposals may include plans focused on a single statewide EV charging network as well as regional, local, or individual charging network installations.

FUNDING and AWARDS: The total estimated funding for this competitive grant opportunity is approximately \$6,150,000. Indiana anticipates awarding cooperative agreements from this announcement subject to the availability of funds and the quality of proposals received.

CONTENTS BY TOPIC

1. Grant Overview	2
2. Goals and Objectives of Program.....	4
3. Applicant Eligibility	4
4. Electric Vehicle Charging Equipment Project Types	4
5. Ineligible Projects	6
6. Costs Eligible for Reimbursement.....	7
7. Application Limitations and Requirements	7
8. Funding and Cost-Share Requirements	8
9. Award Timeline and Requirements	9
10. Project Reporting and Monitoring Requirements.....	11
11. How to Apply	11
12. Evaluation of Applications.....	13
13. Application Questions.....	15
14. Appendix A - DCFC and L2 Project Requirements	17
15. Appendix B - Indiana EV Charging Roadway Priorities.....	20
16. Appendix C - Current Indiana Direct-Current Fast Charge and Level 2 Site Locations	22

1. Grant Overview

On January 11, 2017, a [Third Partial Settlement and Consent Decree](#) was finalized between the U.S. Justice Department, the Volkswagen (VW) Corporation and its subsidiaries regarding the installation and use of emission testing defeat devices in over 590,000, 2.0- and 3.0-liter subject vehicles sold and operated in the U.S. beginning in 2009. On September 6, 2017, the United States filed its Notice of and Memorandum in Support of Its Unopposed Motion for Court Approval of Finalized Trust Agreements. The Court approved the Trust documents shortly after this filing. The Environmental Mitigation Trust Fund is the result of a Consent Decree between the U.S. Justice Department, the Volkswagen Corporation, and its subsidiaries. The settlement required Volkswagen to pay \$2.9 billion into an Environmental Mitigation Trust Fund, to offset the excess air pollution emitted by some of the Volkswagen vehicles that violated the Clean Air Act. Indiana has dedicated approximately \$39.77 million from the Trust for projects that provide direct emission reductions across the state with all funds being fully disbursed by 2028. The breakdown of funding for these emission-reducing projects can be found in Table 1.

IDEM, through its commissioner, is authorized to conduct clean air projects through the award of grant funds by [Indiana Code 13-17-3-9](#).

Table 1 – Eligible Mitigation Actions and Indiana Intended Allocations

Eligible Mitigation Action	Intended Allocation
Category 1 – Class 8 Local Freight and Drayage Trucks	\$21,320,000
Category 2 – Class 4 – 8 School, Shuttle, Transit Buses	
Category 6 – Class 4 – 7 Local Freight Trucks	
Category 3 – Freight Switchers	\$8,200,000
Category 4 – Ferries and Tug Boats	
Category 7 – Airport Ground Support Equipment	
Category 8 – Forklifts and Port Cargo Handling Equipment	
Category 5 – Ocean/Lake Going Vessels Shorepower	\$0
Category 9 – Light Duty Zero Emission Supply Equipment	\$6,150,000
Category 10 – Diesel Emission Reduction Act Option	\$4,100,000
Total	\$39,770,000

As noted above, approximately \$6,150,000 has been allocated to Category 9 – Light Duty Zero Emission Supply Equipment used to improve Indiana’s statewide electric vehicle (EV) charging network. If IDEM decides to partially fund a proposal, it will do so in a manner that does not prejudice any grantee or affect the basis upon which the proposal was evaluated and selected for an award, and that maintains the integrity of the competition and the evaluation process. This document provides the program and application guidance necessary to applicants interested in participating in this funding opportunity.

This program will fund two types of EV charging station equipment: Direct-Current Fast Charge (DCFC) and Level 2 (L2). The financial breakdown of available funds for these project types can be found in Table 2. For more information on this funding opportunity, other Indiana Volkswagen Environmental Mitigation Trust programs, and to sign up for updates visit <https://www.in.gov/idem/airquality/2712.htm>.

Table 2 – EV Charging Equipment and Allocated Funding

EV Charging Equipment Type	Allocated Funding
Direct-Current Fast Charge (DCFC)	\$5,535,000
Level 2 (L2)	\$615,000

2. Goals and Objectives of Program

- To develop a statewide EV charging network that provides EV charging locations to the greatest number of citizens
- To create a diverse statewide network that meets the needs of Indiana citizens using both DCFC and L2 charging equipment
- To implement a program that is reliable through multiple charging stations at each location
- To maximize the available funds of \$6.15 million and achieve the greatest value for Indiana’s investment
- To maximize leveraging of public- and private-sourced funds where possible to obtain the greatest number of charging locations possible

3. Applicant Eligibility

Eligible applicants for this program include, but are not limited to:

- For-profit businesses registered with the Indiana Secretary of State
- Nonprofit entities registered with the Indiana Secretary of State
- Federal, state, and local government agencies
- Indiana-based metropolitan planning organizations

4. Eligible Electric Vehicle Charging Equipment Project Types

Indiana intends to allocate 100% of the allotted \$6.15 million through a single round of funding for EV charging locations across the state. All applicants must demonstrate that each station and location has a high potential for utilization.

Two charging station types are eligible for funding through this program: DCFC and L2. These two charging station types serve different key needs of Indiana’s EV owners. While DCFC equipment is often located along interstates and highways to supply the necessary support for long-distance travel, L2 charging equipment is generally located in

residential and retail areas to support more local travel. Together these two types of charging stations can lay the groundwork for a sustainable market for EV owners and station providers across Indiana.

Additional requirements for DCFC and L2 charging stations can be found in Appendix A at the end of this document.

Projects funded under this program will be reimbursed at the maximum dollar amount per charging location or percentage of the total location-specific project costs, whichever is less. The maximum amount and percentage of total costs per location eligible for reimbursement can be found in Table 3.

Table 3 - Summary of Maximum Funding Amount or Percent per Charging Location

EV Charging Equipment Type		Government Agency Publicly Available	Nongovernment Agency Publicly Available	Not Publicly Available
Direct-Current Fast Charge (DCFC)	Max Dollars per Location	\$180,000	\$160,000	\$120,000
	Max Percentage of Project	90%	80%	60%
Level 2 (L2)	Max Dollars per Location	\$9,000	\$8,000	\$6,000
	Max Percentage of Project	90%	80%	60%

Direct Current Fast Charge Sites

The Federal Highway Administration (FHWA) designates Interstates, U.S. Routes, and State Highways as alternative fuel corridors. These alternative fuel corridor designations include all alternatively fueled vehicles, not only electric vehicles. They do, however, provide some general insight into where all alternatively fueled vehicles are likely to operate. As it relates to electric vehicles, this designation is a result of demonstrated local interest, demand for charging stations along these corridors, and regional electric vehicle (EV) travel and traffic counts. IDEM recognizes the value of using FHWA corridor designation as a supporting method to identify key areas for EV charging stations in Indiana. To cover all areas of the state, IDEM will focus this program’s

efforts on Indiana Interstates, U.S. Routes, and State Highways over-and-above those currently designated by FHWA. These roadway priorities and traffic volume counts can be found in Appendix B of this document.

A comprehensive database of existing DCFC and L2 charging locations can be found at the U.S. Department of Energy's [Alternative Fueling Station Locator](#). According to the Alternative Fueling Station Locator, Indiana currently has 18 non-Tesla DCFC charging stations online. A list and map of existing non-Tesla DCFC sites in Indiana can be seen in Appendix C of this document.

To appropriately prepare these roadways for long-distance EV travel, the DCFC component of this program is focused on, but not limited to, locating additional DCFC charging sites for light-duty EVs along the roadways listed in Appendix B. The overarching intent of this program is to help fill in existing and projected gaps in Indiana's EV charging station network. Due to their proprietary nature, Tesla supercharger locations are not considered a part of the publicly available charging station network.

All DCFC projects shall meet the requirements listed in Appendix A: DCFC and L2 Project Requirements included in this guidance, where applicable.

Level 2 Charging Sites

The most common EV charging infrastructure currently online in Indiana is L2 charging stations and they can be installed at a much lower cost than DCFC stations. Because of this lower cost, investing in L2 stations can accomplish a great deal even with a notably smaller investment of Indiana's funds. According to the Alternative Fueling Station Locator, Indiana currently has 171 non-Tesla L2 charging stations online. Appendix C of this document also includes a list and map of these station locations.

L2 charging stations can provide conveniently located and accessible charging opportunities. This program does not restrict L2 charging locations to any particular roadway and these sites may be geographically located anywhere across the state.

All L2 projects shall meet the requirements listed in Appendix A: DCFC and L2 Project Requirements included in this document, where applicable.

5. Ineligible Projects

Projects not eligible for award under this program include, but may not be limited to:

- Installation of Level 1 charging equipment
- Installation of hydrogen fueling stations
- DCFC sites more than one (1) road mile off Indiana roadways highlighted in Appendix B. Exceptions may be considered on a case-by-case basis provided the need for these exceptions are clearly documented and supported.

- Projects not meeting the requirements listed in Appendix A

6. Costs Eligible for Reimbursement

Costs directly incurred by the grantee through the purchase and/or installation of eligible equipment after the execution of a project funding agreement are eligible for reimbursement subject to the limitations in Table 3. These costs may include the procurement of goods and services from vendors and contractors, labor costs incurred by the grantee's employees for installation, and other costs necessary to complete the project. All costs must be supported by appropriate documentation. IDEM retains the sole authority to determine eligible project costs.

7. Application Limitations and Requirements

Applicants may submit more than one application; however, each application must request funds for either DCFC or L2; not both. An applicant can include the addition of an L2 charger in the form of leveraged funds in a DCFC application. Each application may include more than one charging site. If submitting more than one charging site in an application (or multiple applications), the applicant must prioritize sequentially the charging sites at the time of submission (unless the application is for a full, statewide charging network). Awards will be made on a cost-reimbursement basis. This means grantees must incur the cost of the project before being repaid. Costs must be incurred only after a project is selected for an award and a project funding agreement has been executed between IDEM and the grantee.

Eligible project costs include, but are not limited to:

- DC fast charging station, power conversion, hardware, and associated equipment (with required warranties)
- Level 2 charging station, hardware and associated equipment (with required warranties)
- Supporting costs such as final design, engineering and permitting
- Utility upgrades such as transformers and extensions
- Initial networking/subscription activation fees for a charging network (often included as a component of the required 5-year warranty as detailed in Appendix A)
- Payment module, as required by this program
- Cord or cable management strategy including retractable cords
- Battery storage

- Construction and/or installation costs directly related to the charging station such as dedicated parking spaces, electrical service and connection, on-site sign installation, installation of lighting, shelter/awning construction, etc.

Costs Ineligible for Reimbursement

Funds awarded by this program cannot be used for administrative costs, lobbying, or for the intervention in federal regulatory or adjudicatory proceedings. Costs incurred before the execution of the project funding agreement are also ineligible project costs and will not be reimbursed.

Ineligible costs include, but are not limited to:

- Research projects and studies
- Feasibility studies such as surveys to determine interest in the installation of EV charging stations in particular locations
- Proposals for any type of vehicle demonstration or demonstrations of existing technologies for public outreach or education
- Land or parking space purchase/lease
- Level 1 infrastructure
- Internet and/or cellular connection (wireless or otherwise)
- Ongoing or annual networking/subscription fees for a charging network outside of those included in 5-year warranty as detailed in Appendix A
- Electricity consumption and demand charges
- General maintenance or repair of equipment or facilities
- Administrative costs
- Signs and installation of signs located off-site or along adjacent roadways directing drivers to the charger locations
- Other capital costs, such as the construction of buildings, parking facilities, etc. or general maintenance other than the supply equipment.
- Construction or installation of site amenities not directly related to the charging station such as restrooms

8. Funding and Cost-Share Requirements

Grantees will receive reimbursement for eligible costs incurred up to the maximum dollar amount or percentage of total costs listed in the project funding agreement. No costs to be

reimbursed may be incurred before the execution of the project funding agreement. A cost is considered incurred if it has been ordered, contracted, purchased, or installed. Requests for reimbursement shall be in a manner as specified by IDEM and must include documentation to show that the equipment has been received and installed by the grantee; the equipment is fully operational; all requirements of the project funding agreement have been met; and that the costs have been incurred and paid by the grantee.

Mandatory cost-shares are required for all projects. Reimbursement of eligible costs will only be provided up to the maximum dollar amount or percentage of total costs included in the project funding agreement and in accordance with this document. The remaining project costs are the responsibility of the grantee and serve as the grantee's cost-share. In-kind donations are not eligible project costs and may not be credited as part of a grantee's cost-share.

Preference will be given to proposals that include a financial cost-share match over and above those detailed in this announcement. This will enable the program to maximize the total funds available.

Disqualification from Funding

The grantee shall not receive reimbursement if complete and truthful information has not been submitted to IDEM. The grantee will be disqualified and shall not receive reimbursement if the grantee has:

- Not submitted a claim for reimbursement and all required documentation by the deadline included in the project funding agreement, or
- Incurred costs before the execution of the agreement.

9. Award Timeline and Requirements

All applicants will be notified regarding their award status at the conclusion of the funding cycle. Applicants selected to receive funding will be required to execute a project funding agreement with IDEM. Although not required at the time of application, a simple site plan showing the charging site location, planned site improvements to be reimbursed, and other pertinent details of the project parcel will be required before a draft agreement is provided by IDEM to the recipient. If the successful applicant fails to deliver an executed agreement within 30 days of receipt, IDEM, at its sole discretion, may cancel the award and award the funds to another applicant.

Upon execution of the agreement by IDEM, a copy of the fully executed agreement will be returned to the grantee, at which time the funding will be considered awarded. The project, including the purchase of equipment, may not occur before the execution of the agreement.

IDEM proposes the following estimated timeline:

Project Milestone	Approximate Date of Completion	Approximate Accumulated Time from Web Posting
RFP Posted Online	June 23, 2020	
Proposal Receipt Deadline	September 23, 2020	13 Weeks
Proposal Review, Prioritization, and Selection	October 21, 2020	17 Weeks
Selected Proposal Notification	October 28, 2020	18 Weeks
Grant Agreements Fully Executed	November 25, 2020	22 Weeks
Projects Completed and Fully Implemented	December 31, 2022	131 Weeks

Agreement Terms

Applicants interested in applying for funding should consider the following items that will be part of the requirements addressed in the agreement:

- All projects selected for funding shall be completed no later than December 31, 2022. If an application indicates a project cannot be completed within this timeframe, it will not be considered for funding.
- Charging locations funded by this program must be in operation for not less than five years. Sites may be upgraded by the grantee over this period, but the number of charging plugs and minimum charging capability shall not be reduced.
- Grantees will be required to submit biannual and final reports to IDEM, as well as progress reports upon request.
- The claim for reimbursement of costs and all required documentation is due to IDEM within one month after the completion of the project. IDEM will not reimburse the applicant until all requirements are met. No reimbursement will be made for any costs incurred in the development of a project that is not successfully completed and placed in service. Failure to maintain the project and comply with all terms of the agreement will result in the repayment of funds reimbursed. Under no circumstances will reimbursement be made for costs incurred before the execution of the agreement.

- Grantees should expect to allow a minimum of 90 days for reimbursement processing.
- Grantees will procure all goods and services in accordance with state law and must make a good faith effort to encourage competition. All documents relating to procurement will be made available to IDEM upon request.
- All information submitted to IDEM over the course of the project, including all records supporting all expenditures of funds, is subject to inspection by interested parties and disclosure to the public, subject to any applicable confidentiality exceptions provided in applicable state or federal laws.

10. Project Reporting and Monitoring Requirements

Grantees will be required to submit biannual reports to IDEM from the contract start date until the project is completed, along with a final report, and interim progress reports upon request. Additionally, all grantees will submit annual station utilization data to IDEM for no less than 5 years after project completion. At a minimum, the following information will be submitted for each charging station installed:

- Number of charging events
- Connect and disconnect times
- Start and end charge times
- Number of unique vehicles connected
- Total kWh dispensed per charging event
- Average kWh per charging event
- Peak power (kW) per event
- Peak power (kW) by time and date
- Peak power demand (kW) by month
- Average duration of charging events
- Percentage of station downtime

11. How to Apply

Indiana will only accept electronic grant applications in response to this RFP. Electronic grant application narratives and any required supporting materials must be submitted in a single Microsoft Word or PDF document format, to VWTrust@idem.in.gov. Electronic submissions will be considered timely upon receipt, not transmission. An e-mail response confirming receipt of electronic proposals will be provided on or before the

closing date when possible. Hard-copy, facsimile, and late submissions will not be accepted.

Applicants may submit more than one application; however, each application must request funds for either DCFC or L2; not both. Each application may include more than one charging site location. If submitting more than one charging site location in an application (or multiple applications), the applicant must prioritize sequentially the charging site locations at the time of submission (unless the application is for a full, statewide charging network). An applicant can include the addition of an L2 charger in the form of leveraged funds in a DCFC application. **Completed applications are due by email before September 23, 2020, 5:00 p.m.** Applications received after the deadline will be deemed ineligible and will not be reviewed. Incomplete applications may be disqualified from consideration. IDEM is not responsible for any errors or delays caused by technical difficulties resulting from the emailing of applications.

Content and Form of Application Submission

The grant application must contain the following information, preferably in the sequential order shown:

1. Signed cover letter on the applicant's letterhead that briefly summarizes the applicant's proposal.
2. If the applicant is a privately-owned entity, the application must include a completed and signed copy of the Automated Direct Deposit Authorization Agreement and W-9 Form.
3. Narrative Work Plan. This document, a maximum of 15 pages in length, must conform to the following outline:
 - a. *Project Title.*
 - b. *Title of IDEM RFP from which funds are being requested.*
 - c. *Grantee Information:* Include applicant (organization) name, address, contact person, phone number, fax, and e-mail address.
 - d. *Funding Requested:* Specify the amount of monies being requested from the program.
 - e. *Total Project Cost:* Specify the total cost of the project, including program funding and applicant's financial cost-share. Identify funding from other sources where needed along with a clear demonstration that these funds are in-hand and obligated to this project.
 - f. *Project Schedule:* Provide a detailed project schedule starting from the approximate award date (for planning purposes, Grantees should assume funds will be available by no later than 60 days after notification of

award), including all key milestones that demonstrate progress, along with a projected completion date.

- g. *Project Description:* Explicit description of how the proposed project meets the program's goals and objectives along with the requirements detailed in Appendix A, to include:
- i. A detailed project summary, a description of specific actions to be undertaken, and the estimated timeline for each component.
 - ii. An explanation of how the project benefits air quality for citizens of Indiana, including an estimate (and how the estimate is calculated) of the number of citizens positively affected.
 - iii. A plan for tracking and measuring the progress toward achieving the anticipated outcomes of the project.
 - iv. An explanation of how project success will be evaluated.
 - v. A detailed summary describing the physical location(s) where EV charging stations will be installed along with a demonstration that current and anticipated EV utilization supports long-term viability at the location.
 - vi. A description of the roles of the applicant and partners, if any.
 - vii. Contact information for all key personnel.
 - viii. To the extent not covered above, information to address the evaluation criteria included in this document.

12. Evaluation of Applications

Eligible projects will be evaluated on a competitive basis according to the scoring criteria listed in Table 4. While the scoring criteria provided in this section are the primary means of determining a selected project, IDEM may also consider other factors not included in these scoring criteria in making the final selection of projects. In addition to the quantitative evaluation based on Table 4 below, additional qualitative considerations will be given to applications that include:

- Reasonable geographic distribution of projects across the state.
- Collaboration among a diverse set of stakeholders to advance a broader environmental vision or goal for the area.
- Evidence of regional support of a project.
- Evidence of a clear plan of action, milestones, and schedule for project completion.

- Evidence of commitment by the owner to maintain DCFC and/or L2 charging station equipment
- Evidence of project implementation feasibility without significant obstacles to ensure continued use of the charging station.

Projects will be evaluated and scored based on the following criteria:

Table 4: Scoring Criteria and Maximum Points Available

Scoring Criteria	Maximum Points Available
Cost-effectiveness of the project (a ratio of the total investment of VW program funds to annual average daily traffic at project location)	25
Long-term Sustainability and Maintenance of Site (ability to continue efforts or expand the project after the mitigation project funding is utilized)	20
Compliments other programs for a statewide network or the application itself supports a statewide network (the ability of the proposal to meet the goal for a statewide network and to fill in infrastructure gaps)	20
Verified leveraging of additional resources (financial only).	15
Project Readiness (is project “shovel-ready” and what is projected total project build timeline)	10
Quality of site marketing and amenities (amenities such as restrooms, food, and shopping; and marketing; and marketing of site location to consumers)	10
TOTAL POINTS AVAILABLE	100

Disqualification of Applications

IDEM may reject outright and may not evaluate applications for any one of the following reasons:

- The applicant fails to deliver the application by the due date and time.
- The applicant acknowledges that a requirement of the application cannot be met.
- The applicant's proposal materially changes a requirement of this guidance or the proposal is not compliant with the requirements of this guidance.
- The applicant's proposal limits the rights of IDEM.
- The applicant fails to timely respond to IDEM's request for information, documents, or references.
- The applicant fails to include an original signature.
- The applicant presents the information requested by this guidance in a format inconsistent with the instructions of the guidance or otherwise fails to comply with the requirements of the guidance.
- The applicant provides misleading or inaccurate responses.
- There is insufficient evidence (including evidence submitted by the applicant and evidence obtained by IDEM from other sources) to satisfy IDEM that the applicant is properly qualified to satisfy the requirements of the guidance or application.
- The proposed project(s) are not in compliance with applicable state and federal statutes and rules.

13. Application Questions

Questions or requests for clarification about this program may be submitted in writing via email to SSeals@idem.in.gov. Verbal questions will not be addressed. If the question or request for clarification pertains to a specific section of this guidance document, please reference the section and page number. A list of written questions and answers will be available for review at <https://www.in.gov/idem/airquality/2712.htm>.

IDEM reserves the right to amend this guidance at any time by addendum. If the addendum is issued after the closing date for receipt of applications, IDEM may, in its sole discretion, allow applicants to amend their project applications in response to the addendum, if necessary.

IDEM Discretion

IDEM may select a part of an application for funding and/or may offer to fund less than the dollar amount requested in an application. IDEM reserves the right to reject any or all applications, in whole or in part, any time before the execution of a project funding agreement.

IDEM is not obligated to fund an application from an applicant that has demonstrated marginal or unsatisfactory performance on previous grants or contracts with IDEM or other state agencies.

IDEM reserves the right to verify the information contained in the application. This may include utilizing publicly available information and other outside sources to evaluate the applicant's performance under other contracts.

IDEM Disclaimer

IDEM accepts no obligation for costs incurred by the applicant in anticipation of being awarded a grant. IDEM creates no obligation expressed or implied by issuing this Request for Proposals or by receipt of any projects submitted. The award of any grant monies shall be at the sole discretion of IDEM. Neither this Request for Proposals nor any response resulting from this announcement is to be construed as a legal offer.

THE REST OF THIS PAGE HAS BEEN INTENTIONALLY LEFT BLANK.

Appendix A: DCFC and L2 Project Requirements

	Direct-Current Fast Charge (DCFC) Sites	Level 2 (L2) Sites
Site Requirements		
Located no more than one (1) road mile off roadways listed in Appendix B of this document. Exceptions may be considered on a case-by-case basis provided the need for these exceptions are clearly documented and supported.	•	
Publicly visible, accessible, and available to drivers for charging (24 hours a day, 7 days a week)	•	•
Sites must provide a safe, well-lighted area for users	•	•
Paved parking spaces to allow the maximum capacity of EVs to be charged simultaneously	•	•
Appropriate signage on-site for drivers to locate charging station from the site entrance	•	•
Clear signage and pavement stenciling that states the location is for “Electric Vehicle Charging Only”	•	•
Equipment Requirements		
DCFC site rated at a minimum of 100kW. This can be accomplished by pairing two (2) 50kW stations in such a manner that one (1) vehicle can obtain a minimum of 100kW charging level, but the equipment will also charge two (2) vehicles separately at a minimum of 50kW.	•	
Each DCFC offers both CHAdeMo and SAE Combo/CCS (Combo Charging System) compatible connectors	•	

Each Level 2 charger offers a J1772 compatible connector		•
Charging equipment must be certified through the Nationally Recognized Testing Laboratory (NRTL) program to demonstrate compliance with appropriate product safety test standards	•	•
Charging enclosure must be constructed for use outdoors in accordance with UL50, Standard for Enclosures for Electrical Equipment, NEMA, Type 3R exterior enclosure or equivalent	•	•
A cord management system or method to eliminate potential for cable entanglement, user injury and connector damage from lying on the ground	•	•
PAYMENTS, PRICING, & DATA REQUIREMENTS		
Universal payment system allowing multiple payment methods to be used by charging drivers	•	•
Real-time pricing information displayed on the device or payment screen	•	
Utilization of open standards including OCPP	•	•
Equipment is networked by Wi-Fi or cellular connection and network hardware and software is maintained with the capability for: remote diagnostics, remote start of the equipment, collecting and reporting usage data, processing payments, and tracking usage by the kilowatt-hour.	•	•
Annual site utilization data collection	•	•
SPONSOR/VENDOR REQUIREMENTS		
Make every effort to educate the general public of the existence of the new charging site including registering the site on a station locator	•	•

Customer service support is available by telephone 24 hours a day and 7 days a week and is clearly posted to assist customers with difficulties accessing or operating the equipment	•	
Customer service support is available by telephone from 6am to 6pm, Monday through Saturday and is clearly posted to assist customers with difficulties accessing or operating the equipment		•
Site development, project installation, and maintenance shall comply with all applicable laws, ordinances, regulations, and standards, including, but not limited to, the Americans with Disabilities Act (ADA).	•	•
Equipment has at least a 5-year warranty with the option of additional ongoing maintenance and support with an uptime guarantee on the equipment of 95% or greater for the full lifetime of the charging station	•	•
Should repair be necessary, chargers shall be fully operating within 72 hours of equipment issue/breakdown to ensure a 95% annual uptime guarantee.	•	

THE REST OF THIS PAGE HAS BEEN INTENTIONALLY LEFT BLANK.

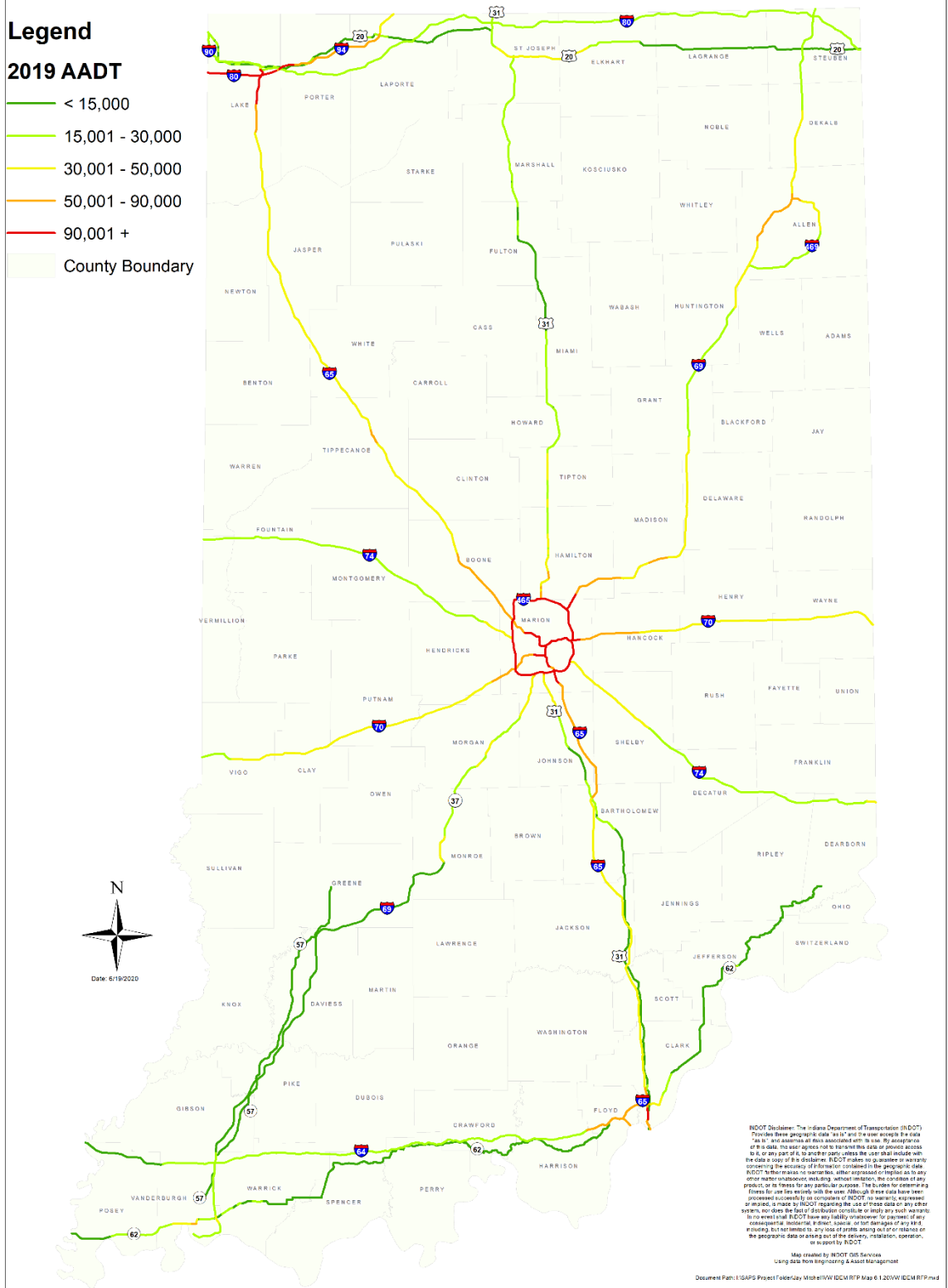
Appendix B: Indiana EV Charging Roadway Priorities

Annual average daily traffic (AADT) is the total volume of vehicle traffic on a roadway for a calendar year divided by 365 days. AADT can be a useful and simple measurement to identify where traffic volume might best support the installation of EV charging stations. The map on the following page shows the AADT for the priority roadways for this program.

THE REST OF THIS PAGE HAS BEEN INTENTIONALLY LEFT BLANK.

2019 Annual Average Daily Traffic for Selected Indiana Corridors

- Legend**
- 2019 AADT**
- < 15,000
 - 15,001 - 30,000
 - 30,001 - 50,000
 - 50,001 - 90,000
 - 90,001 +
 - County Boundary



INDOT disclaimer: The Indiana Department of Transportation (INDOT) provides these geographic data "as is" and the user accepts the data "as is" and assumes all risks associated with its use. No representation of it is made, the user agrees not to hold the state or INDOT liable for any errors or omissions, either expressed or implied, as to any other matter whatsoever, without limitation, the contents of any product, or its fitness for any particular purpose. The burden for determining errors for use lies entirely with the user. Although these data have been processed successfully by an authorized user of INDOT, no warranty, expressed or implied, is made by INDOT regarding the use of these data or any other system, nor does the fact of distribution constitute or imply any such warranty. In no event shall INDOT have any liability, contractual or otherwise, for any consequential, incidental, indirect, special, or tort damages of any kind, including, but not limited to, any loss of profits, arising out of or based on the geographic data or arising out of the delivery, installation, operation, or support by INDOT.

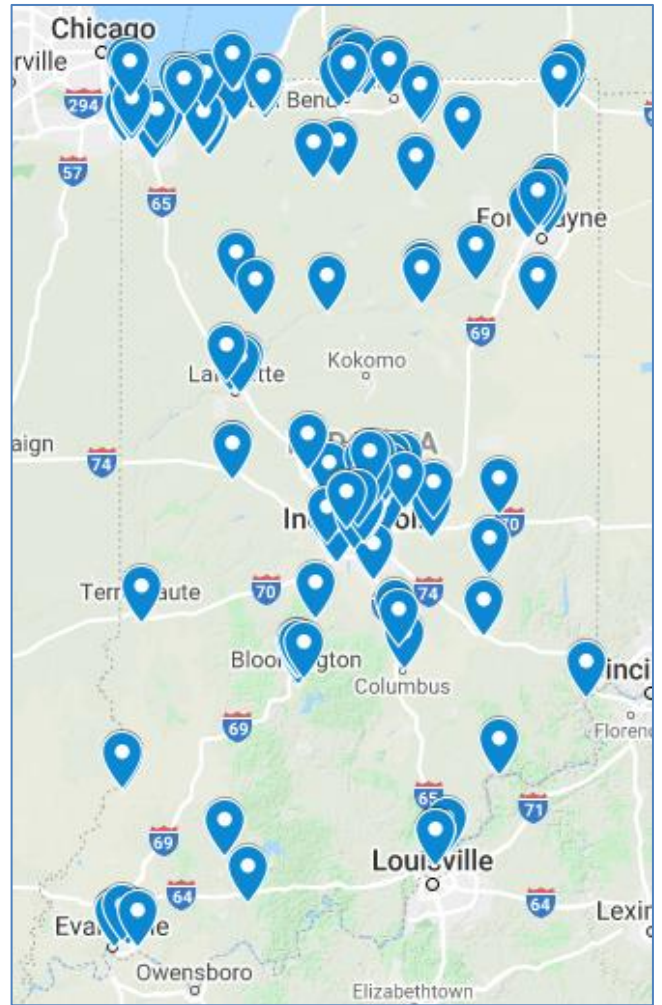
Map created by INDOT GIS Services
 Using data from Engineering & Asset Management
 Document Path: I:\GIS\Projects\FolderJay_Mitchell\INDOT\Map 6.12019\INDOT\Map6

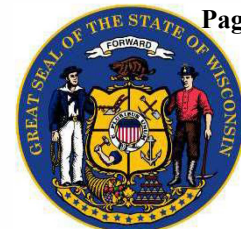
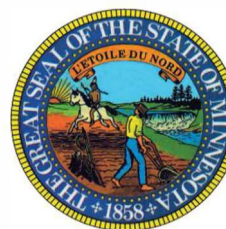
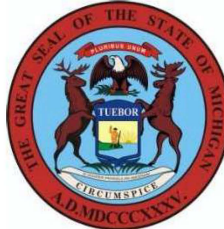
Appendix C: Current Indiana Direct-Current Fast Charge and Level 2 Site Locations

**Direct-Current Fast Charge
Locations
(18 across Indiana)**



**Level 2
Locations
(171 across Indiana)**





**Regional Electric Vehicle Midwest Coalition
Memorandum of Understanding
Between
Illinois, Indiana, Michigan, Minnesota, and Wisconsin**

THIS MEMORANDUM OF UNDERSTANDING (“MOU”) is made on this the 30th day of September 2021, by and between the States of Illinois, Indiana, Michigan, Minnesota, and Wisconsin (hereinafter referred to as the “Participating States”).

BACKGROUND:

Imperative for Electrification:

- Electric vehicle adoption will create jobs, expand economic opportunity, promote energy independence, improve public health and result in cleaner air and water.
- Electrification will improve public health and result in cleaner air and water throughout rural, suburban, and urban areas by reducing pollutants such as carbon dioxide.

Economic Opportunity:

- Participating States have demonstrated economic leadership in the transportation, manufacturing, logistics and distribution, mobility, and automotive sectors, and are positioned to facilitate an economically robust, equitable transition to electric vehicles.
- Facilitating economic growth through vehicle electrification, clean energy manufacturing, and advanced mobility solutions is instrumental to shared regional economic goals.
- Maintenance and fuel savings through electric vehicle adoption offer significant potential benefits for vehicle and fleet owners, particularly low-income households and small businesses.

Promoting Equity:

- Wide-scale electric vehicle adoption will further reduce vehicle costs, increase the availability of public charging infrastructure, reduce harmful emissions making all communities more sustainable, healthy and equitable places to live, work and play including historically disadvantaged communities.

OBJECTIVES:

The Regional Electric Vehicle Midwest Coalition (“REV Midwest”), established through this MOU, creates a regional framework to accelerate vehicle electrification in the Midwest. REV Midwest provides the foundation for cooperation on fleet electrification along key commercial corridors to safeguard economic security, reduce harmful emissions, improve public health, and advance innovation. REV Midwest will future proof the region’s manufacturing, logistics, and transportation leadership and position the region to realize additional economic opportunity in clean energy manufacturing and deployment.

Participating States will develop a coordinated approach to advance electrification that is informed by industry, academic, and community engagement. Participating States will work

together to enable an equitable transition to electric vehicles for all with specific consideration for communities that are historically disadvantaged. REV Midwest will position states in the Midwest region to leverage and collectively increase public and private investment in electric vehicles and electric vehicle infrastructure.

- **Accelerate Medium- and Heavy-Duty Fleet Electrification:** Through REV Midwest, Participating States will remove barriers to electric MHDV adoption through coordination on charging infrastructure optimization, cooperation on best practices to standardize regulatory schemes, communications, and charging experience.
- **Elevate Economic Growth and Industry Leadership:** Building on the advanced manufacturing, engineering, research and development, and technological expertise of the Midwest, REV Midwest will coordinate to advance clean energy and mobility manufacturing, safeguard industry electrification leadership, grow the region's share of electric vehicle production, and elevate access to tools required to equip the workforce of tomorrow. REV Midwest will work to create opportunity for all communities, with a focus on assisting those that are historically disadvantaged.
- **Advance Equity and Clean Environment:** REV Midwest will advance equity by providing the data and tools to drive an equitable, data-driven, transition to electric vehicles for all communities. To reduce emissions, REV Midwest will cooperate with energy providers to address the full emissions reduction potential and encourage community sustainability through grid advancement.

REV Midwest will engage with public and private sector stakeholders who are instrumental in the transition to a more sustainable future, and advocate for regional advancement on a federal level. REV Midwest will position the region for national and global leadership in applying advanced mobility solutions to improve public health, generate economic growth, and address greenhouse gas emissions through the accomplishment of the following activities.

ACTIVITIES:

1. ACCELERATE MEDIUM- AND HEAVY-DUTY FLEET ELECTRIFICATION
 - A. Participating States will coordinate on regional EV infrastructure siting optimization and deployment strategies with an initial focus on target routes of commercial significance.
 - B. Participating States will share best practices to inform the standardization of regulatory schemes and public communications, and to develop a common customer experience across state lines.
 - C. Participating States will coordinate on best practices for working with energy providers to ensure sustained electricity supply and grid resilience.
2. ELEVATE ECONOMIC GROWTH AND INDUSTRY LEADERSHIP
 - A. Participating States intend to evaluate strategic challenges and opportunities of manufacturing, logistics, transportation, energy, mobility, and automotive industry leaders to inform a timely, equitable, and economically robust future of electrification.

- B. Participating States, through industry coordination, will work to understand shifts in workforce demand and cooperate on workforce development programs to deliver accessible skilling programs to drive job growth and an equitable transition for the region's manufacturing, maintenance, energy, and transportation industries.
 - C. Participating States will coordinate on multi-state advanced technology deployments spanning mobility, connectivity, automation, energy, and electrification. Deployments will be considered in collaboration with technology, industry, university, and research partners.
3. ADVANCE EQUITY AND CLEAN ENVIRONMENT
- A. Participating States will work to identify and engage with historically disadvantaged communities to understand challenges and desired outcomes to inform engagement, education, and workforce development opportunities around electrification.
 - B. Participating States will seek to align incentives to support electric MHDV deployments, increase availability of charging infrastructure, and generate economic opportunity in all communities.
 - C. Participating States will cooperate with energy providers to reduce emissions and criteria pollutants from MHDVs through electrification and expanding renewable energy and energy efficiency.

PROCESS

- A. Participating States will maintain a Taskforce of senior leadership from each state.
- B. The Taskforce will meet regularly to share updates and input on REV Midwest.
- C. The Taskforce will regularly maintain information describing REV Midwest activities.
- D. The Taskforce will identify barriers to private sector and publicly supported charging station development and work together on recommendations to remove these barriers.
- E. The Taskforce will complete progress reports at regular intervals summarizing progress made towards the goals of REV Midwest.
- F. The Participating States agree to support the Taskforce and its responsibilities.

VOLUNTARY INITIATIVE:

This MOU is not legally binding. Any Participating State may withdraw at any time at its sole discretion through written statement submitted to the other Participating States.

ADDITIONAL PROVISIONS:


This MOU may be modified, terminated, or expanded by unanimous agreement of the authorized representatives to the Taskforce from the Participating States.

THE STATE OF ILLINOIS


By: _____

J.B. Pritzker
Governor of Illinois

THE STATE OF INDIANA


By: _____

Eric Holcomb
Governor of Indiana

THE STATE OF MICHIGAN


By: _____

Gretchen Whitmer
Governor of Michigan

THE STATE OF MINNESOTA


By: _____

Tim Walz
Governor of Minnesota

THE STATE OF WISCONSIN


By: _____

Tony Evers
Governor of Wisconsin

CERTIFICATE OF SERVICE

This is to certify that a copy of *OUCC Public's Exhibit No. 1 Testimony of OUCC Witness John E. Haselden* has been served upon the following parties of record in the captioned proceeding by electronic serve on January 6, 2022.

DEI-Petition

Andrew J. Wells
Elizabeth A. Heneghan
DUKE ENERGY BUSINESS SERVICES, LLC
andrew.wells@duke-energy.com
beth.heneghan@duke-energy.com

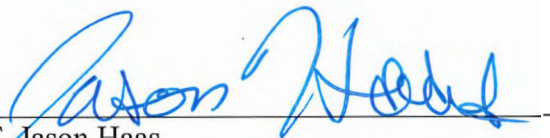
Charge Point, Inc.-Intervenor

David T. McGimpsey
DENTONS BINGHAM GREENEBAUM LLP
david.mcgimpsey@dentons.com

CAC-Intervenor

Jennifer A. Washburn
CITIZENS ACTION COALITION
jwashburn@citact.org

Reagan Kurtz
rkurtz@citact.org



T. Jason Haas
Deputy Consumer Counselor

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

PNC Center
115 West Washington Street, Suite 1500 South
Indianapolis, Indiana 46204
317-232-2494 Main Office
317-232-3315 Jason's Direct Line
317-232-5923 Facsimile
infomgt@oucc.IN.gov