

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

FILED
November 30, 2020
INDIANA UTILITY
REGULATORY COMMISSION

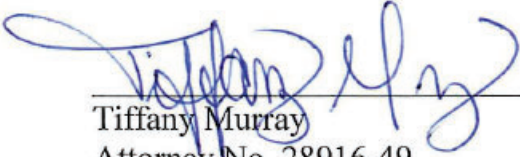
VERIFIED PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC FOR (1) APPROVAL OF AN)
ADJUSTMENT TO ITS ELECTRIC SERVICE RATES)
THROUGH ITS TRANSMISSION, DISTRIBUTION, AND)
STORAGE SYSTEM IMPROVEMENT CHARGE)
("TDSIC") RATE SCHEDULE; (2) AUTHORITY TO)
DEFER 20% OF THE APPROVED CAPITAL)
EXPENDITURES AND TDSIC COSTS FOR RECOVERY IN)
PETITIONER'S NEXT GENERAL RATE CASE; and (3))
APPROVAL OF PETITIONER'S UPDATED 7-YEAR)
ELECTRIC PLAN, INCLUDING ACTUAL AND)
PROPOSED ESTIMATED CAPITAL EXPENDITURES)
AND TDSIC COSTS THAT EXCEED THE APPROVED)
AMOUNTS IN CAUSE NO. 44733-TDSIC-6, AND (4))
AUTHORITY TO MODIFY THE RATEMAKING)
TREATMENT AUTHORIZED IN CAUSE NO. 44371, ALL)
PURSUANT TO IND. CODE § 8-1-39-9.)

CAUSE NO. 44733 TDSIC-7

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR
PUBLIC'S EXHIBIT NO. 1
PUBLIC (REDACTED) TESTIMONY OF
OUCW WITNESS JOHN E. HASELDEN

November 30, 2020

Respectfully submitted,



Tiffany Murray
Attorney No. 28916-49
Deputy Consumer Counselor

TESTIMONY OF OUCC WITNESS JOHN E. HASELDEN
CAUSE NO. 44733 TDSIC-7
NORTHERN INDIANA PUBLIC SERVICE COMPANY 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 employed as a Senior Utility
4 Analyst in the Electric Division of the Indiana Office of Utility Consumer
5 Counselor (“OUCC”). I describe my educational background and preparation for
6 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 a number of cases before the Commission, including DSM,
10 renewable energy, environmental tracker cases, transmission, distribution, and
11 storage system improvement charge (“TDSIC”) cases, and applications for
12 Certificates of Public Convenience and Necessity (“CPCN”).

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

14 A: I provide my opinion, from an engineering perspective, regarding Northern Indiana
15 Public Service Company LLC’s (“Petitioner” or “NIPSCO”) request for
16 Commission approval to update cost estimates in its 7-Year Plan for eligible
17 transmission, distribution and storage system improvements (“TDSIC Plan” or
18 “Plan”) in this TDSIC proceeding (“TDSIC-7”). I address whether the TDSIC-7
19 Plan is consistent with the Settlement Agreement in Cause No. 44733 (“44733
20 Settlement Agreement”) as well as the Settlement Agreement in Cause No. 44733

1 TDSIC-4 (“TDSIC-4 Settlement Agreement”). I provide an overview of NIPSCO’s
2 TDSIC-7 Plan update, including the overall progress of the projects in the Plan and
3 the annual and cumulative cost caps. I discuss NIPSCO’s proposal to move or
4 reschedule certain projects affecting the annual cost caps in this Plan. I provide my
5 analysis results and evaluation of certain project cost variances driving factors.
6 Ultimately, I recommend the Commission approve NIPSCO’s TDSIC-7 Plan
7 update and associated project cost estimates.

8 **Q: Please describe the review and analysis you conducted in order to prepare**
9 **your testimony.**

10 A: I reviewed NIPSCO’s Verified Petition, Direct Testimony and Exhibits . I met
11 virtually with NIPSCO representatives on three occasions to discuss projects
12 included in this proceeding.¹

II. TDSIC-7 PLAN UPDATE AND PROGRESS

13 **Q: Please summarize NIPSCO’s progress implementing its TDSIC Plan.**

14 A: As of July 31, 2020, NIPSCO made total gross expenditures of \$708,056,004.²
15 NIPSCO continues to make substantial progress implementing the Plan. This
16 progress involved reprioritizing projects, as well as postponing certain projects
17 because they cannot be constructed in the near-term for various reasons. When
18 postponing certain projects, consistent with the Cause No. 44733 Settlement
19 Agreement, other projects already in the Plan that can be constructed within the

¹ August 26, 2020, September 16, 2020, and October 28, 2020.

² Cause No. 44733 TDSIC-7, Petitioner’s Exhibit No. 3, Direct Testimony of Charles A. Vamos, Confidential Attachment 3C, (line 376, columns E, F, G added together).

1 Plan's timeframe can move up to the current construction year. In total, there were
2 64 projects moved up or postponed in this most recent Plan.

III. ANNUAL AND CUMULATIVE COST CAPS REVIEW

3 **Q: Please provide an overview of the annual cost caps in NIPSCO's proposed**
4 **TDSIC-7 Plan update.**

5 A: The TDSIC-4 Settlement Agreement resulted in a revised total maximum cost cap
6 on NIPSCO's 7-Year TDSIC capital expenditures of \$1.19 billion and included cost
7 caps by year through the 7-Year Plan.³ Subject to the 44733 Settlement Agreement
8 terms the Commission approved on July 12, 2016, NIPSCO retains the ability to
9 reschedule projects and, in so doing, adjusts the affected years' annual caps by the
10 approved estimates of the rescheduled projects.⁴ Therefore, the affected years'
11 annual caps will *increase* or *decrease* in correspondence with the moving *in* or *out*
12 of the rescheduled project's approved estimate.⁵ Further, the 44733 Settlement
13 Agreement allows NIPSCO "the ability to deviate above each annual cost recovery
14 cap by no more than 5% in a rolling historical three-year period."⁶ NIPSCO
15 previously received approval for cap moves and adjusted annual caps in its TDSIC-

³ See Cause No. 44733 TDSIC-4, Settlement Agreement, page 3.

⁴ See Cause No. 44733, Settlement Agreement, Section 5(b) – T&D Plan Flexibility, Page 4, "In the event that a given project, in whole or in part, is rescheduled to a different year, the annual cost recovery caps for the affected years will be adjusted by that project's whole or partial approved cost estimate to reflect the change (e.g., if a \$10 million project is moved from 2018 to 2019, the annual cap for 2018 will be reduced by \$10 million and the annual cap for 2019 will be increased by \$10 million)."

⁵ The cost cap will increase for the year the project moved into and decrease for the year the project moved out of correspondingly by the amount of the project's approved estimate.

⁶ See Cause No. 44733, Settlement Agreement, Section 4(d) – Capital Cost Reductions and Cost Cap, Page 3. "Any amount below the annual cap in a given year may be rolled over as an increase to the cap for the following years within the three-year rolling period. Any amount above the annual cap in a given year will operate as an offset to the available cap variance for the following years within the three-year rolling period."

1 1 through TDSIC-6 filings.⁷ It proposes to do the same in this Cause.⁸ Table JEH-
2 1 below shows the caps approved in TDSIC-4 and the proposed cap moves and
3 annual cap adjustments.⁹

4 **Table JEH-1**

Year	TDSIC-6 Caps*	Proposed moves TDSIC-7	Proposed Caps TDSIC-7
2016**	\$ 148,902,101		\$ 148,902,101
2017**	\$ 142,424,313		\$ 142,424,313
2018**	\$ 140,711,494		\$ 140,711,494
2019	\$ 204,209,201	\$ 3,445,187	\$ 207,654,388
2020	\$ 159,940,790	\$ (24,093,870)	\$ 135,846,920
2021	\$ 170,455,000	\$ 3,223,406	\$ 173,678,406
2022	\$ 224,922,640	\$ 17,425,277	\$ 242,347,917
Total	\$ 1,191,565,539		\$ 1,191,565,539

*Set by the TDSIC-4 Settlement Agreement

** Final

5 In its Plan Update-7, NIPSCO proposes to decrease the cost caps in years 2020, and
6 to increase the caps in years 2019, 2021, and 2022 from the amounts most recently
7 approved.

8 **Q: Are NIPSCO's proposed TDSIC-7 Plan cap moves and annual cap**
9 **adjustments consistent with the 44733 Settlement Agreement?**

10 A: Yes. As discussed by Petitioner's witness Kristi L. Figg, NIPSCO exceeded the
11 2019 cap by a small amount; however, not beyond that permitted by the historical
12 3-year rolling average agreed to in the approved 44733 Settlement Agreement.¹⁰ In

⁷ See NIPSCO's cap moves in Line No. 39 of Petitioner's Exhibit No. 4, Attachment 4-B in Cause No. 44733 TDSIC-7

⁸ See Cause No. 44733 TDSIC-7, Petitioner's Exhibit No. 4, Attachment 4-B, line no. 6.

⁹ Table 3 data source: Petitioner's Exhibit No. 4.

¹⁰ Cause No. 44733 TDSIC-7, Petitioner's Exhibit No. 4, Direct Testimony of Kristi L. Figg, page 16, lines 1-7.

1 addition, the proposed Plan exceeds the allowed cap in year 2020.¹¹ The caps for
2 years 2016 through 2019 should now remain unchanged throughout the remaining
3 years of NIPSCO's 7-Year Plan.

4 **Q: Please provide an overview of the cumulative caps in NIPSCO's TDSIC-7**
5 **proposed Plan update.**

6 A: Based on the 44733 Settlement Agreement, NIPSCO can aggregate or roll over a
7 portion of its annual cost cap, as an increase to the cap, for following years within
8 a three-year rolling period.¹² The cumulative cap mechanism adds flexibility to the
9 Plan by allowing any amount spent over or under the previous year cap to roll over
10 as an increase or decrease to the following years' caps, respectively, within a three-
11 year period. As Ms. Figg discusses, the Plan will exceed the cumulative allowed
12 amount in year 2020.¹³

13 **Q: Do you have any concerns regarding NIPSCO's proposed cap moves, annual**
14 **cap adjustments, and cumulative caps in this Cause?**

15 A: No, not at this time. In future TDSIC filings, I expect NIPSCO will adjust the Plan
16 to bring the estimated costs within the caps, spend less than the estimated amounts,
17 or not seek recovery of excess amounts.

IV. HISTORICAL AND PROPOSED ANNUAL CAPS VS. PLAN SPEND

18 **Q: Please describe the difference between NIPSCO's annual caps and its**
19 **projected capital spend (or "Plan Spend").**

20 A: NIPSCO's Plan update in each TDSIC filing includes its projected Plan Spend by
21 year. NIPSCO's annual Plan Spend does not necessarily equal its corresponding

¹¹ *Id.* at lines 13-16.

¹² *See* Cause No. 44733 Settlement Agreement, Section 4(d) – Capital Cost Reductions and Cost Cap, Page 3.

¹³ Cause No. 44733 TDSIC-7, Figg, page 16, lines 10-12.

1 annual cap. Table JEH-2 below summarizes NIPSCO's proposed annual caps vs.
2 its annual Plan Spend in this TDSIC-7 Plan.¹⁴

3 **Table JEH-2**

Year	Proposed Caps TDSIC-7	Annual Plan Spend	Difference	Cumulative Difference
2016*	\$ 148,902,101	\$ 129,450,119	\$ (19,451,982)	\$ (19,451,982)
2017*	\$ 142,424,313	\$ 128,472,905	\$ (13,951,408)	\$ (33,403,390)
2018*	\$ 140,711,494	\$ 137,380,657	\$ (3,330,837)	\$ (36,734,227)
2019	\$ 207,654,388	\$ 220,686,824	\$ 13,032,436	\$ (23,701,791)
2020	\$ 135,846,920	\$ 151,436,333	\$ 15,589,413	\$ (8,112,378)
2021	\$ 173,678,406	\$ 152,615,022	\$ (21,063,384)	\$ (29,175,762)
2022	\$ 242,347,917	\$ 146,357,664	\$ (95,990,253)	\$ (125,166,015)
Total	\$ 1,191,565,539	\$ 1,066,399,524	\$ 125,166,015	

* Final Actual

4 **Q: Does your review of NIPSCO's historical annual caps, proposed annual caps,**
5 **Plan Spends, and variances show NIPSCO will exceed the total maximum**
6 **\$1.19 billion cap?**

7 A: No. In this Plan update, NIPSCO projects a total Plan Spend of approximately \$1.07
8 billion.¹⁵ As Petitioner's witness Charles A. Vamos discusses, NIPSCO moved
9 approximately 75 projects with an estimated cost of \$170 million outside of the
10 Plan period.¹⁶

V. PROJECT COST ESTIMATE INCREASES GREATER THAN
OR EQUAL TO \$100,000 OR 20%

11 **Q: Please describe your review of NIPSCO's proposed TDSIC-7 Plan update**
12 **projects with cost estimate increases greater than or equal to \$100,000 or 20%.**

13 A: I reviewed the data and variance information contained in Petitioner's Confidential
14 Attachment 3-B for each of the Plan years 2019 through 2022. I also reviewed the

¹⁴ Table JEH-2 data source: Cause No. 44733 TDSIC-7, Petitioner's Exhibit No. 4, Attachment 4-B.

¹⁵ Cause No. 44733 TDSIC-7, Vamos, page 39, Table 1.

¹⁶ *Id.*, page 40, lines 1-8.

1 Project Change Request documentation for 2019 and 2020 projects. I reviewed Mr.
2 Vamos' testimony concerning projects showing cost increases greater than
3 \$100,000 or 20%, whichever is greater. I also discussed a sampling of these projects
4 with Mr. Vamos and the NIPSCO team during a meeting on October 28, 2020.

5 **Q: Please discuss the results of your analysis and review.**

6 **A:** I identified the following 62 projects in NIPSCO's TDSIC-7 Plan update with cost
7 increases greater than or equal to \$100,000 or 20%:

8 **2019 Projects**

- 9 1. TSRU31: Fiber Optic – Munster to Taney \$ [REDACTED] (17%);
10 2. D4KVLPC1: 4kV Line Pre-construction \$ [REDACTED] (26%); and
11 3. Substation Engineering – Distribution \$ [REDACTED] (6%).

12 **2020 Projects**

- 13 1. SRU31: Fiber Optic - Munster to Taney, \$ [REDACTED] (161%);
14 2. TSRU44: Fiber Optic – Leesburg to Kosciusko, \$ [REDACTED] (26%);
15 3. TSBRU25: Breaker Upgrade – Angola Upgrades (69kV) \$ [REDACTED] (38%);
16 4. TSPC1: Substation Pre-construction - Transmission \$ [REDACTED] (10%);
17 5. D4KVL15: 4kV Conversion – Decatur \$ [REDACTED] (10%);
18 6. D4KVL16: 4kV Conversion - Decatur \$ [REDACTED] (20%);
19 7. D4KVL17: 4kV Conversion - Central \$ [REDACTED] (47%);
20 8. DSRU8: Relay & Breaker Upgrade - Lake George 34kV \$ [REDACTED] (107%);
21 9. DSBRU16: Breaker Upgrade - Wayne #1 XFMR BKR \$ [REDACTED] (21%);
22 10. DSBRU21: Breaker Upgrade – Highland - #4 Switchgear \$ [REDACTED] (10%);
23 11. DSNRS23: Rebuild Substation – Ohio - #1 Transformer and Breaker
24 \$ [REDACTED] (22%);
25 12. DSNRS25: New Valparaiso Substation – Silhavy Substation \$ [REDACTED] (4%);
26 13. DSNRS37: New Nappanee Substation \$ [REDACTED] (35%);
27 14. DLNRL24: Circuit 3433 Rebuild - Grandview to Bendix West Side \$ [REDACTED]
28 (57%);
29 15. DLNRL36: Circuit Rebuild – Waterloo – 1299 \$ [REDACTED] (224%);
30 16. DLNRL49: Circuit Rebuild – Glen Park – 12-327 \$ [REDACTED] (32%);
31 17. DLNRL54: Circuit Rebuild – Whiting – 12-479 \$ [REDACTED] (11%); and

1 18. DLNRL56: New Valparaiso Substation – Silhavy Substation Associated 12kV
2 Lines \$ [REDACTED] (10%).

3 **2021 Projects**

- 4 1. TSRU29: Fiber Optic – Green Acres to St. John - 13888 \$ [REDACTED] (47%);
5 2. TSRU59: Relay & Breaker Upgrades – Dune Acres to Mittal Burns Harbor –
6 13849 N & 13849 S \$ [REDACTED] (47%);
7 3. TSRU62: Relay Upgrades – Stillwell to Plymouth – 13896 \$ [REDACTED] (44%);
8 4. TSRU63: Relay Upgrades – South Prairie to Westwood (Duke) – 13883
9 \$ [REDACTED] (38%);
10 5. TSBRU19: Breaker Upgrade – St. John Upgrades (345kV & 138kV)
11 \$ [REDACTED] (16%);
12 6. TSBRU22: Breaker Upgrade – Miller – 13810-42 \$ [REDACTED] (35%);
13 7. TSBRU27: Breaker Upgrade – Stillwell Upgrades (69kV) \$ [REDACTED] (39%);
14 8. TSNRS16: New/Rebuild Substation – Babcock - #3 & #4 138/69kV
15 Transformers; Relay & Breaker Upgrades (69kV) \$ [REDACTED] (29%);
16 9. TSNRS18: New/Rebuild Substation – New Michigan City Substation
17 \$ [REDACTED] (100%);
18 10. TSE1: Substation Engineering – Transmission \$ [REDACTED] (52%);
19 11. TLNRL21: Circuit Rebuild – Kosciusko – 6997 – Phase 2 \$ [REDACTED] (11%);
20 12. DSSW1: Substation Switch Projects – Distribution \$ [REDACTED] (48%);
21 13. DSRU6: Relay & Breaker Upgrade – Calumet 34kV \$ [REDACTED] (10%);
22 14. DSBRU19: Breaker Upgrade – Tod – #5 Switchgear \$ [REDACTED] (53%);
23 15. DSBRU25: Breaker Upgrades – Luchtman – 34-124, 34-125 \$ [REDACTED] (34%);
24 16. DSBRU27: Breaker Upgrades – Cline – Switchgear \$ [REDACTED] (39%);
25 17. DSBRU28: Breaker Upgrades – Division – Switchgear \$ [REDACTED] (151%);
26 18. DSBRU32: Breaker Upgrades – Montgomery – Switchgear \$ [REDACTED] (23%);
27 19. DLNRL42: Circuit Rebuild – South Hammond – 12-720 \$ [REDACTED] (199%);
28 20. DLNRL62: Circuit Rebuild – Laporte 1264 \$ [REDACTED] (42%);
29 21. DLNRL63: Circuit Rebuild – Woodmar 12-643 \$ [REDACTED] (31%); and
30 22. DLNRL66: Circuit Reconductor 1 – Wanatah 12-532 \$ [REDACTED] (121%).

31 **2022 Projects**

- 32 1. TSBRU39: Breaker Upgrade – Hiple 6990, 69-104, #3 XFR, & 6923 \$ [REDACTED]
33 (79%);
34 2. TSNRS18: New/Rebuild Substation – New Michigan City Substation \$ [REDACTED]
35 (295%);
36 3. DSBRU30: Breaker Upgrades, – Gibson – Switchgear \$ [REDACTED] (68%);
37 4. DSBRU36: Breaker Upgrade – Aetna – 3475, 34kV N. Bus, 34kV S. Bus
38 \$ [REDACTED] (358%);
39 5. DSBRU39: Breaker Upgrade – Munster – 3428, 3429 \$ [REDACTED] (278%);
40 6. DSNRS29: Rebuild Substation – Griffith – #1 Transformer & Switchgear
41 \$ [REDACTED] (16%);

- 1 7. DSNRS31: Rebuild Substation – Woodmar – #1 Transformer & Switchgear
- 2 \$ [REDACTED] (60%);
- 3 8. DSNRS34: Crocker Substation New Recloser & Incoming Lines \$ [REDACTED]
- 4 (127%);
- 5 9. DSNRS35: New/Rebuild Substation - Creston - Add 2nd Transformer, #1 & #2
- 6 Voltage Regulators, Dbl. Switchgear \$ [REDACTED] (192%);
- 7 10. DSNRS39: New/Rebuild Substation – Hanover – #1 & #2 Transformer with Dbl.
- 8 Switchgear \$ [REDACTED] (116%);
- 9 11. DLNRL52: Circuit Rebuild – S Hammond – 12-719 \$ [REDACTED] (36%); and
- 10 12. DLNRL61: Circuit Rebuild – Madison 12-625 \$ [REDACTED] (52%).

11 **Q: What were the key factors driving the significant cost increases for the projects**
12 **listed above?**

13 A: NIPSCO now performs detailed engineering 24 months ahead of commencing
14 construction. Coupled with lessons learned, the revised cost estimates for future
15 projects are more accurate than the parametric estimates developed years ago.
16 Consequently, there are more significant cost increases in the remaining years of
17 the TDSIC-7 Plan. Many of the projects with cost overruns listed above were small
18 in dollars but exceeded the 20% threshold because the projects themselves were
19 small.

20 A few projects incurred increased costs due to NIPSCO's use of hydro-
21 excavation techniques in the vicinity of other underground utilities where hand-
22 digging conditions are difficult. During our meetings, NIPSCO staff indicated some
23 cost overruns were due to coordinating with other projects and working within tight
24 time frames in which projects can be completed ("clearances"). For example, the
25 Waterloo Circuit Rebuild Project's (Project ID DLNRL36, 2020) cost overruns
26 resulted from shortening the clearance window at MISO's direction, resulting in
27 increased costs labor and traffic control. Other reported reasons for cost overruns
28 include resource availability, unexpected equipment and labor cost increases for

1 changes in scope of projects, and compliance with COVID-19 social distancing
2 restrictions.

3 **Q: Did NIPSCO provide adequate support for the proposed TDSIC-7 Plan**
4 **update's revised project cost estimates?**

5 A: Yes, NIPSCO provided adequate support for the projects I reviewed. Similar to the
6 2019 and 2020 projects, there were some substantial changes due to revising the
7 parametric estimates with detailed engineering estimates and applying lessons
8 learned over the past years. The OUCC will continue to monitor these projects'
9 costs in subsequent TDSIC tracker filings.

10 **Q: Given the cost caps in the TDSIC-4 Settlement Agreement, will the OUCC**
11 **continue reviewing project cost estimate increases proposed in NIPSCO's**
12 **TDSIC Plan updates?**

13 A: Yes. The TDSIC-4 Settlement Agreement does not supersede the OUCC's ability,
14 under the Cause No. 44733 Settlement Agreement, to "challenge any costs that
15 exceed the approved estimates pursuant to Ind. Code § 8-1-39-9(f)."¹⁷ As a matter
16 of policy, and consistent with the 44733 Settlement Agreement and the TDSIC-4
17 Settlement Agreement, the OUCC must ensure NIPSCO's TDSIC projects are
18 planned, constructed, and put into service in a cost efficient manner that delivers
19 the maximum value to NIPSCO's ratepayers.

VI. RECOMMENDATIONS

20 **Q: Please summarize your recommendations.**

21 A: Subject to the recommendations of OUCC witness Mr. Kaleb Lantrip, I recommend
22 the Commission approve NIPSCO's TDSIC-7 Plan update.

¹⁷ See Cause No. 44733, Settlement Agreement, para. 5(b), p. 5.

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

2 **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

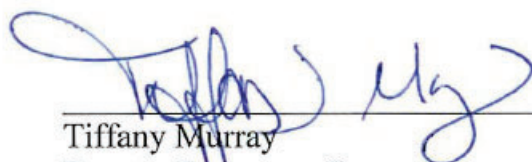
1 the evaluation, measurement and verification (“EM&V”) of DSM programs. My
2 testimony on renewable energy concentrated on IPL’s Rate REP (feed-in tariff, wind
3 power purchase agreements and solar energy. I have provided testimony on behalf of the
4 OUCC in Cause Nos. 43955 (DSM-7 and 8), 43827 (DSM-8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

CERTIFICATE OF SERVICE

This is to certify that a copy has been served upon the following parties of record in the captioned proceeding by electronic service on November 30, 2020.

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