

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC ("NIPSCO"))
PURSUANT TO IND. CODE §§ 8-1-2-42.7, 8-)
1-2-61 AND IND. CODE § 8-1-2.5-6 FOR (1))
AUTHORITY TO MODIFY ITS RATES AND)
CHARGES FOR ELECTRIC UTILITY)
SERVICE THROUGH A PHASE IN OF RATES;)
(2) APPROVAL OF NEW SCHEDULES OF)
RATES AND CHANGES, GENERAL RULES)
AND REGULATIONS AND RIDERS; (3))
APPROVAL OF REVISED COMMON AND)
ELECTRIC DEPRECIATION RATES)
APPLICABLE TO ITS ELECTRIC PLANT IN)
SERVICE; (4) APPROVAL OF NECESSARY)
AND APPROPRIATE ACCOUNTING RELIEF (5))
APPROVAL OF A NEW SERVICE)
STRUCTURE FOR INDUSTRIAL RATES.)

CAUSE NO.: 45159

UNITED STATES STEEL CORPORATION'S
SUBMISSION OF VERIFIED PRE-FILED REPLY TESTIMONY
IN SUPPORT OF SETTLEMENT AGREEMENT

Intervenor, United States Steel Corporation, by counsel, hereby submits the Verified Pre-Filed Reply Testimony of Tony M. Georgis in support of the Settlement Agreement.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *United States Steel Corporation's Submission of Verified Pre-Filed Reply Testimony in Support of Settlement Agreement* has been served upon the following counsel of record via electronic mail this 27th day of June, 2019:

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CAUSE NO.: 45159

VERIFIED PRE-FILED SETTLEMENT REPLY TESTIMONY OF

TONY M. GEORGIS

SUBMITTED ON BEHALF OF UNITED STATES STEEL CORPORATION

JUNE 27, 2019

**SETTLEMENT REPLY TESTIMONY OF
TONY M. GEORGIS**

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6
I. **INTRODUCTION**

7 **Q1. PLEASE STATE YOUR NAME AND ON WHOSE BEHALF YOU ARE**
8 **SUBMITTING TESTIMONY.**

9 A. My name is Tony M. Georgis, the same Tony M. Georgis who has submitted Direct,
10 Cross-Answering and Settlement Testimony on behalf of United States Steel
11 Corporation ("USS") in this Cause.

12 **Q2. WHAT IS THE PURPOSE OF YOUR SETTLEMENT REPLY TESTIMONY?**

13 A. The purpose of my settlement reply testimony is to respond to the testimony the
14 Office of the Utility Consumer Counselor ("OUCC") and the Citizens Action
15 Coalition ("CAC") filed on June 17, 2019, opposing the Stipulation and Settlement
16 Agreement on Revenue Allocation and Rate 831 between Northern Indiana Public
17 Service Company ("NIPSCO"); the NIPSCO Industrial Group; NLMK and United
18 States Steel ("USS"), hereinafter referred to as the "Rate 831 Settlement". The
19 purpose of my testimony is to respond to specific allegations related to USS and rebut

arguments from these parties that the Rate 831 Settlement is not in the public interest or creates a subsidy.

II. USS'S REPLY TO THE OUCC'S TESTIMONY REGARDING THE RATE 831 SETTLEMENT

Q3. WHAT IS YOUR RESPONSE TO OUCC WITNESS BOERGER'S STATEMENT ON PAGE TWO OF HIS TESTIMONY THAT ". . . THE PROPOSED S2 SETTLEMENT [RATE 831 SETTLEMENT] PRESENTS A NUMBER OF SUBSTANTIVE CHANGES TO THE RATE 831 PROPOSAL ORIGINALLY INCLUDED IN NIPSCO'S CASE-IN-CHIEF"?

A. This statement is incorrect. The fundamental rate and structure of Rate 831 remains unchanged and fully recovers the settled revenue requirement associated with the Large Industrial class. Customer eligibility for the rate, how the service tiers will work, and how Large Industrial Customers will contribute to NIPSCO's revenue requirement have not changed from what NIPSCO originally proposed in its Petition in this Cause. The Large Industrial Customers proactively agreed to commit to set amount of Tier 1 Firm Contract Demand elections and a calculated demand rate that fully recovers the required settled revenue requirement for Rate 831. Without such a commitment, the Revenue Requirement Settlement¹ as it relates to Rate 831 is meaningless, because no customer can be forced, either by NIPSCO or the Commission, to take a set level of firm demand. This firm Tier 1 service offering is

¹ The Stipulation and Settlement Agreement entered into on April 25, 2019, between Northern Indiana Public Service Company ("NIPSCO"), the NIPSCO Industrial Group; NLMK Indiana; USS; the Citizens Action Coalition of Indiana, Inc.; Walmart Inc.; Northern Indiana Commuter Transportation District; Sierra Club; and the Indiana Office of Utility Consumer Counselor, and which was joined by the Indiana Municipal Utilities Group on April 30, 2019 (the "Revenue Requirement Settlement").

1 similar to the status quo, in that NIPSCO and its Large Industrial Customers currently
2 have contracts under the existing Commission-approved interruptible rate structure,
3 which commits those customers to a certain level of firm service.

4 **Q4. DR. BOERGER ARGUES ON PAGES FOUR AND FIVE OF HIS**
5 **TESTIMONY THAT THE TERMS "MITIGATION" AND "SUBSIDY" ARE**
6 **NOT THE SAME. HOW DO YOU USE THESE TERMS?**

7 A. Dr. Boerger admits on page 4 of his testimony that although Rate 811 customers have
8 benefited from mitigation, such mitigation “does not necessarily imply a subsidy.”
9 These terms go hand in hand in this case. By simple math, a customer class that
10 generates rate revenues less than the cost of service study justifies, is being subsidized
11 by other rate classes. These subsidized rate classes often characterize the
12 subsidization in a positive light as "mitigation". Mitigation is only intended and used
13 to temporarily mitigate rate shock or dramatic levels of rate increases for specific or
14 targeted customer classes. Mitigation is also used to phase-in rate changes while
15 adjusting a customer class to their cost of service results over time (e.g., two to three
16 years). Mitigation is not a tool that is intended to be permanent or used to apply
17 across-the-board or the same rate increase to all classes as those rate strategies do not
18 move rates to align with the cost of service results. Customer classes that are paying
19 higher rates than their cost of service to fund the “mitigation” are directly subsidizing
20 the other classes. If there is no subsidy in the rate structure, there is no need for
21 mitigation, but as the Rate 831 Settlement notes, there is a sizable subsidy in
22 residential rates. The bottom line is that if Rate 811 is not paying its cost of service, it
23 is being subsidized. Apparently, not only does Dr. Boerger find this suggested and

1 historical subsidy of residential customer rates to be acceptable, but he also wants to
2 increase it.

3 In addition to the subsidy in the settled revenue requirement, recall that Rate
4 831 is further subsidizing other customer classes based on the transmission portion of
5 the Allocated Cost of Service Study ("ACOSS"). My direct testimony proved Large
6 Industrial Customers are paying \$17 million more than their cost of service for
7 transmission (when there were only five customers expected in Rate 831, not the
8 current six) and subsidizing the transmission costs of other customer classes. A sixth
9 customer will only increase this level of transmission subsidy, which is simply
10 ignored by the OUCC.

11 **Q5. WHY IS IT IMPORTANT NOT TO LOOK AT THIS CASE IN ISOLATION**
12 **FROM NIPSCO'S PAST RATE CASES?**

13 A. Dr. Boerger argues that under Rate 831, Large Industrial Customers avoid NIPSCO's
14 "legacy based costs" embedded in NIPSCO's system. Many times when a utility
15 proposes a move towards cost-based rates, those who benefit from the subsidies
16 vehemently object. The Commission should not look at Rate 831 in isolation, and
17 ignore years of subsidization by Large Industrial Customers to the benefit of other
18 customer classes. Upward movement in NIPSCO's rates and sustained subsidization
19 will cause the continued bypass of NIPSCO's system by Large Industrial Customers,
20 if the Commission does not take steps to change the course and approve Rate 831.

21 **Q6. WHAT IS YOUR REACTION TO DR. BOERGER'S ARGUMENT THAT**
22 **INDUSTRIAL CUSTOMERS ARE MORE "RISKY" AND PRESUMABLY**

1 **ADDITIONAL COSTS SHOULD BE ALLOCATED TO THEM IN RATE**
2 **DESIGN (PAGES 6-8)?**

3 A. First, Rate 831 customers are already paying a subsidy and premium under current
4 rates and have been for years. NIPSCO's rates are already too high and are not
5 competitive. This is why USS's existing cogen is beneficial and future cogen is still a
6 possibility if Rate 831 is not approved. Second, if Large Industrial Customer rates are
7 increased, it just exacerbates the problem of industrial customers leaving the system
8 or taking other steps to reduce load, and increases rate volatility and risk for other
9 customer classes. The OUCC's proposal amplifies the existing uncompetitive rate
10 environment rather than creating a competitive, cost-based solution that Rate 831
11 provides. Rate 831 helps to ensure that Large Industrial Customers commit to staying
12 on NIPSCO's system and paying a cost-based share of system costs.

13 **Q7. ON PAGE 8 OF HIS TESTIMONY, DR. BOERGER CHARACTERIZES THE**
14 **LOSS OF ADDITIONAL USS LOAD IF RATE 831 IS NOT APPROVED AS**
15 **"MODEST", DO YOU AGREE WITH HIS CHARACTERIZATION?**

16 A. No.

17 **Q8. PLEASE EXPLAIN.**

18 A. Certainly, the loss of USS's Tier 1 firm load could be considered "modest" when
19 viewed through the lens of NIPSCO's total system load and rate base. However, it is
20 important to look at the financial impact of the USS load within the context of the
21 position that the OUCC is taking on Rate 831. Under Rate 831, Large Industrial
22 Customers have a combined firm revenue allocation of \$149.4 million. While not
23 indicative of any one particular customer's share, on average, there is a \$24.9 million

1 contribution to the revenue requirement for each of the six Large Industrial
2 Customers. This is more than the \$20 million lower end of the OUCC's alleged Rate
3 831 "cost shift" range. These demand costs would shift to other customers in the
4 event USS installed additional cogeneration and took additional firm load off of
5 NIPSCO's system. Other Large Industrial Customer load leaving the system would
6 only increase the impact on NIPSCO's remaining customers. Therefore, the financial
7 impact of just one (let alone more than one) Large Industrial Customer leaving
8 NIPSCO's system is well within the range of the \$20 million to \$40 million in "cost
9 shifting" that the OUCC argues exists under Rate 831.

10 While, as I have already testified, USS does not agree there is a cost shift
11 inherent in Rate 831, assume for the sake of argument that it does exist. If it does,
12 then the OUCC argues that this "cost shift" is *so significant* that it is advocating that
13 the Rate 831 Settlement should not be approved as presented. While at the same
14 time, the OUCC is apparently willing to let USS leave NIPSCO's system entirely and
15 create what is characterizes as a "modest" cost shift *in the very same range*. The
16 OUCC contradicts itself regarding what is 'modest' and therefore important in terms
17 of public policy and rate design.

18 **Q9. WHAT IS YOUR RESPONSE TO DR. BOERGER'S TESTIMONY THAT**
19 **THE ADJACENT AFFILIATE QUALIFYING FACILITY PREMISE**
20 **TRANSMISSION CHARGE ("AAQFPTC") IN RATE 831 IS**
21 **UNREASONABLE?**

22 A. First, as I've testified before, Rate 831 already overpays on transmission relative to
23 NIPSCO's cost of service. Thus, increasing the AAQFPTC only exacerbates that

1 problem. NIPSCO's methodology for calculating the AAQFPTC rate has not
2 changed from what was filed in the Petition. Instead, NIPSCO refined two inputs in
3 that calculation: (1) the revenue requirement changed for the entire NIPSCO system
4 due to the Revenue Requirement Settlement; and (2) Tier 1 Firm Contract Demand
5 changed under the Rate 831 Settlement, which changed the kWh billing determinants
6 for the AAQFPTC. See Figure 1 below:

7 Figure 1

	kWh	AAQFPTC Rate (\$/kWh)
Petition:	1,236,346,843	\$0.002747
Rebuttal:	1,236,346,843	\$0.002686
Settlement Corrected:	1,178,848,519	\$0.002557

8

9 Thus, the AAQFPTC as calculated by NIPSCO accurately reflects the impacts of both
10 settlements in this Cause.

11 **Q10. WHAT IS YOUR RESPONSE TO DR. BOERGER'S RECOMMENDATION**
12 **THAT NIPSCO BE REQUIRED TO RECALCULATE ITS DEMAND**
13 **ALLOCATION TRACKER ALLOCATORS TO ELIMINATE THE RATE 831**
14 **TIER 1 ADJUSTMENT?**

15 A. These tracker costs are only applicable to NIPSCO full requirements customers or
16 portions of customers' loads that are full requirements service. Rate 831 Tier 1
17 service is full requirements service, while Tier 2 and 3 are not. The Demand
18 Allocation on Attachment 19-S1-C, page 1 of the Rate 831 Settlement shows the
19 \$31.5M (21%) adjustment to which Dr. Boerger refers on page 11 of his testimony.
20 This Demand Allocation is used for the RTO and FMCA riders. These riders are not

1 applicable to Tiers 2 and 3 because Rate 831 customers are buying energy in the
2 wholesale market. Large Industrial Customers should not pay NIPSCO's system
3 costs covered by these riders because they are not using NIPSCO's system under the
4 market-based rate concept. The only part of NIPSCO's system that USS will be
5 using is bulk transmission, and those transmission costs are recovered under the Rate
6 831 tariff similarly to how I describe in my answer provide for Question 9 above.

7 **Q11. WHAT ARE YOUR THOUGHTS ON DR. BOERGER'S TESTIMONY THAT**
8 **IN THE EVENT RATE 831 IS NOT APPROVED, THE COMMISSION CAN**
9 **SIMPLY ADDRESS LARGE INDUSTRIAL RATES IN A PHASE 2**
10 **PROCEEDING AND ORDER NIPSCO TO FILE A NEW SET OF RATES**
11 **BASED ON THE EXSITING 700 SERIES RATE DESIGN?**

12 A. While I am not an attorney, I think there are some practical problems with Dr.
13 Boerger's suggested approach. Large Industrial Customers comprise a large portion
14 of NIPSCO's rate structure and revenue. Ratemaking has numerous pieces, as does
15 the cost of service study, and eliminating the proposed and settled rate design of the
16 largest load on NIPSCO's system that ensures full cost recovery and replacing it at a
17 later date while all other elements of NIPSCO's rate structure remain static leads to
18 significant uncertainty and potential volatility. It does not allow Rate 831 customers
19 proper time to plan and evaluate customer and bill impacts and implications of the
20 rates. The current and proposed rate structures are not an "apples to apples"
21 comparison, and the rates should not be delayed and potentially replaced in this way.

22 Under the Rate 831 Settlement, as part of the normal compromise of litigation
23 positions that is needed to reach a settlement, USS has agreed to accept a rate design

1 that it still believes, at least in part, contains subsidies. To request those subsidies
2 continue in another form or alternative rates that provide none of the benefits of Rate
3 831 is neither fair nor equitable. None of the Large Industrial Customers qualify
4 under any other of NIPSCO's proposed rate classes, and NIPSCO has not presented
5 any form or pricing of an interruptible credit in this proceeding, which is a key
6 element of the existing 700 series rates. In the event Rate 831 is not approved,
7 customers should be permitted to revisit arguments regarding the full access,
8 functionalization and allocation of costs so that they have a fair opportunity to present
9 evidence to the Commission regarding proper rate design for all customers.

10 **III. USS'S REPLY TO THE CAC'S TESTIMONY REGARDING THE RATE 831**
11 **SETTLEMENT**

12 **Q12. WHAT IS YOUR REACTION TO THE TESTIMONY OF CAC WITNESSES**
13 **KERWIN OLSEN AND JONATHAN WALLACH?**

14 A. Both Messrs. Olsen and Wallach continue to mischaracterize Rate 831 as a subsidy to
15 industrial customers. Their testimony is largely repetitive of their direct and cross-
16 answering positions. I will not repeat my arguments as to why there is not a subsidy
17 in Rate 831. It is important to understand, while Large Industrial Customers rate
18 revenues are decreasing from current levels, this is largely because their rates reflect
19 the true cost of service, and they are no longer procuring the vast majority of their
20 power from NIPSCO. Large Industrial Customers still must pay to cover their load,
21 either via the market pass-through rates under Tier 2, or to a third party under Tier 3.
22 While Rate 831 customers have the opportunity to benefit from the market, they are
23 also taking on risk.

1 Whether any individual customer will receive a benefit under Rate 831
2 depends largely on the stability of MISO market rates, and the customer's success in
3 negotiating favorable third party contracts for energy and capacity. Rate 831
4 customers are agreeing to expose themselves to a great deal of market risk, potentially
5 volatile MISO market rates (particularly in system emergencies and times of extreme
6 weather), and incur the time and expense of negotiating third party agreements for
7 energy and capacity. Rate 831 is simply not a "guaranteed win" for Large Industrial
8 Customers, nor is it a guaranteed rate savings. It is a regulatory solution to the
9 problem of NIPSCO's continued load loss and provides an economic alternative for
10 some of the largest companies in Indiana to remain customers of NIPSCO.

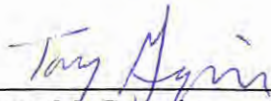
11 **Q13. DOES THIS CONCLUDE YOUR TESTIMONY?**

12 A. Yes, it does.

VERIFICATION

I, Tony M. Georgis, affirm under penalties for perjury that the foregoing representations are true and correct to the best of my knowledge, information and belief as of the date filed herein.

Date: June 27, 2019



Tony M. Georgis