FILED September 12, 2018 INDIANA UTILITY REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF SOUTHERN INDIANA GAS AND ELECTRIC COMPANY d/b/a VECTREN ENERGY DELIVERY OF INDIANA, INC. ("VECTREN SOUTH") FOR (1) ISSUANCE OF A CERTIFICATE OF PUBLIC CONVENIENCE AND **NECESSITY FOR THE CONSTRUCTION OF A COMBINED** CYCLE GAS TURBINE GENERATION FACILITY ("CCGT"): (2) APPROVAL OF ASSOCIATED RATEMAKING AND ACCOUNTING TREATMENT; (3) ISSUANCE OF A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR COMPLIANCE PROJECTS TO MEET FEDERALLY MANDATED REQUIREMENTS ("CULLEY 3 COMPLIANCE **CAUSE NO. 45052** PROJECT"); (4) AUTHORITY TO TIMELY RECOVER 80% OF THE COSTS INCURRED DURING CONSTRUCTION AND OPERATION OF THE CULLEY 3 COMPLIANCE PROJECTS THROUGH VECTREN SOUTH'S ENVIRONMENTAL COST ADJUSTMENT MECHANISM: (5) AUTHORITY TO CREATE REGULATORY ASSETS TO RECORD (A) 20% OF THE REVENUE REQUIREMENT FOR COSTS, INCLUDING CAPITAL, OPERATING, MAINTENANCE, DEPRECIATION, TAX AND FINANCING COSTS ON THE CULLEY 3 COMPLIANCE PROJECT WITH CARRYING COSTS AND (B) POST-IN-SERVICE ALLOWANCE FOR FUNDS USED **DURING CONSTRUCTION, BOTH DEBT AND EQUITY, AND** DEFERRED DEPRECIATION ASSOCIATED WITH THE CCGT AND CULLEY 3 COMPLIANCE PROJECT UNTIL SUCH COSTS ARE REFLECTED IN RETAIL ELECTRIC RATES: (6) ONGOING REVIEW OF THE CCGT: (7) AUTHORITY TO IMPLEMENT A PERIODIC RATE ADJUSTMENT MECHANISM FOR RECOVERY OF COSTS DEFERRED IN **ACCORDANCE WITH THE ORDER IN CAUSE NO. 44446:** AND (8) AUTHORITY TO ESTABLISH DEPRECIATION RATES FOR THE CCGT AND CULLEY 3 COMPLIANCE PROJECT ALL UNDER IND. CODE §§ 8-1-2-6.7, 8-1-2-23, 8-1-8.4-1 ET SEQ, 8-1-8.5-1 ET SEQ., AND 8-1-8.8 -1 ET SEQ.

NOTICE OF SUBMISSION OF WORKPAPERS

Southern Indiana Gas & Electric Company d/b/a Vectren South Delivery of Indiana, Inc. ("Vectren South") hereby provides notice that it has submitted to the Commission, on CDs, the public, non-confidential workpapers in native format supporting the rebuttal testimony and exhibits of the following witnesses:

- 1. Wayne Games (Petitioner's Exhibit No. 4-R)
- 2. Matthew Rice (Petitioner's Exhibit No. 5-R)
- 3. Rina H. Harris (Petitioner's Exhibit No. 8-R)
- 4. J. Cas Swiz (Petitioner's Exhibit No. 13-R)

and the confidential workpapers supporting the rebuttal testimony and exhibits of the following witnesses, filed pursuant to the Commission's Docket Entry dated March 29, 2018 granting Petitioner's request for confidential treatment:

- 1. Matthew Rice (Petitioner's Exhibit No. 5-R)
- 2. Matthew Lind (Petitioner's Exhibit No. 6-R)

Respectfully submitted,

Robert E. Heldorn (Atty No. 14264-49)

P. Jason Stephenson (Atty. No. 21839-49)

VECTREN CORPORATION

One Vectren Square 211 N.W. Riverside Drive

Evansville, Indiana 47708

Telephone: (812) 491-4203 Facsimile: (812) 491-4238

Email: rheidorn@vectren.com

jstephenson@vectren.com

Nicholas K. Kile (Atty No. 15203-53)

Hillary J. Close, (Atty No. 25104-49) Lauren M. Box (Atty No. 32521-49)

Barnes & Thornburg LLP

11 South Meridian Street

Indianapolis, Indiana 46204

Kile Telephone: (317) 231-7768 Close Telephone: (317) 231-7785

Box Telephone: (317) 231-7289

Facsimile: (317) 231-7433

Email: nicholas.kile@btlaw.com hillary.close@btlaw.com

lauren.box@btlaw.com

Attorneys for Southern Indiana Gas and Electric Company d/b/a Vectren South Delivery of Indiana, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that Vectren South's Notice of Submission of Rebuttal

Workpapers was served via electronic transmission to:

Lorraine Hitz Bradley
Abby Gray
Randy Helmen
OFFICE OF UTILITY CONSUMER COUNSELOR
Ihitzbradley@oucc.in.gov
rhelmen@oucc.in.gov
agray@oucc.in.gov
infomgt@oucc.in.gov

Robert E. Heidorn
Jason Stephenson
Vectren Corporation
rheidorn@vectren.com
jstephenson@vectren.com

Robert Hartley
Alan S. Brown
Darren A. Craig
Frost Brown Todd LLC
rhartley@fbtlaw.com
abrown@fbtlaw.com
dcraig@fbtlaw.com

Michael Kurtz Boehm Kurtz & Lowry mkurtz@bklawfirm.com Jennifer A. Washburn
Margo Tucker
Citizens Action Coalition of Indiana, Inc.
mtucker@citact.org
jwashburn@citact.org

Nikki Shoultz
Kristina Kern Wheeler
Bose McKinney & Evans LLP
nshoultz@boselaw.com
kwheeler@boselaw.com

Todd A. Richardson
Tabitha L. Balzer
Lewis & Kappes, P.C.
trichardson@lewis-kappes.com
tbalzer@lewis-kappes.com

Jeffrey A. Earl jeff@lewisandearl.com

Thom Cmar
Cass McCrae
tcmar@earthjustice.org
cmccrae@earthjustice.org

this 12th day of September, 2018.

Hillary J. Close