

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

VERIFIED PETITION OF NORTHERN INDIANA PUBLIC)
SERVICE COMPANY LLC FOR (1) APPROVAL OF AND A)
CERTIFICATE OF PUBLIC CONVENIENCE AND)
NECESSITY FOR A FEDERALLY MANDATED PIPELINE)
SAFETY III COMPLIANCE PLAN; (2) AUTHORITY TO)
RECOVER FEDERALLY MANDATED COSTS INCURRED)
IN CONNECTION WITH THE PIPELINE SAFETY III)
COMPLIANCE PLAN; (3) APPROVAL OF THE)
ESTIMATED FEDERALLY MANDATED COSTS)
ASSOCIATED WITH THE PIPELINE SAFETY III)
COMPLIANCE PLAN; (4) AUTHORITY FOR THE TIMELY)
RECOVERY OF 80% OF THE FEDERALLY MANDATED)
COSTS THROUGH RIDER 190 - FEDERALLY) CAUSE NO. 45703
MANDATED COST ADJUSTMENT RIDER ("FMCA)
MECHANISM"); (5) AUTHORITY TO DEFER 20% OF THE)
FEDERALLY MANDATED COSTS FOR RECOVERY IN)
NIPSCO'S NEXT GENERAL RATE CASE; (6) APPROVAL)
OF SPECIFIC RATEMAKING AND ACCOUNTING)
TREATMENT; (7) APPROVAL TO DEPRECIATE THE)
PIPELINE SAFETY III COMPLIANCE PLAN ACCORDING)
TO NIPSCO'S COMMISSION APPROVED)
DEPRECIATION RATES; AND (8) APPROVAL OF)
ONGOING REVIEW OF THE PIPELINE SAFETY III)
COMPLIANCE PLAN; ALL PURSUANT TO IND. CODE §)
8-1-8.4-1 *ET SEQ.*, § 8-1-2-19, § 8-1-2-23, AND § 8-1-2-42)
AND, TO THE EXTENT NECESSARY, APPROVAL OF AN)
ALTERNATIVE REGULATORY PLAN PURSUANT TO)
IND. CODE § 8-1-2.5-6.)

INDUSTRIAL GROUP'S SUBMISSION OF
STIPULATED CROSS-EXAMINATION EXHIBIT

NIPSCO Industrial Group ("Industrial Group"), by counsel, respectfully submits the attached cross-examination exhibit, NIPSCO's response to Industrial Group Data Request 2-1, which will be offered into evidence at the August 15, 2022 evidentiary hearing in lieu of cross-examination of NIPSCO Witness Dousias. Counsel for the Industrial Group has conferred with

counsel for NIPSCO and the Indiana Office of Utility Consumer Counselor, and the parties have agreed to stipulate to the admissibility and have no objections to the Industrial Group exhibit.

Respectfully submitted,

LEWIS & KAPPES, P.C.

/s/ Aaron Schmoll

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon the following via electronic mail, this 12th day of August, 2022:

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NIPSCO Industrial Group's
Cross-Examination Exhibit

Cause No. 45703
Northern Indiana Public Service Company LLC's
Objections and Responses to
NIPSCO Industrial Group Data Request Set No. 2

Industrials Request 2-001:

Please provide allocation factors, by rate class, proposed by NIPSCO for the proposed Plan.

Objections:

Response:

As stated in Witness Dousias Direct Testimony "NIPSCO proposes that all federally mandated costs associated with Pipeline Safety III Compliance Plan be based on the allocators set forth in the revenue allocation in Paragraph B.8. of the Joint Stipulation and Settlement Agreement dated March 2, 2022 filed in NIPSCO's currently pending gas rate case proceeding in Cause No. 45621."

NIPSCO created the following table using the revenue allocation schedule as referenced in Witness Dousias Testimony to show specific allocators based on the margin increase included and now approved in Cause No. 45621.

Rate Code	Total Margin ^[1]	Total Allocation %
111	\$ 348,286,513	65.5%
115	2,803,488	0.5%
121 / 134	108,985,045	20.5%
125	14,101,750	2.7%
128 DP	12,868,178	2.4%
128 HP	38,580,809	7.3%
138	5,651,898	1.1%
Total	\$ 531,277,681	100.0%

Also included in Witness Dousias Direct Testimony "NIPSCO proposes to continue to adjust its allocation percentages to reflect the significant migration of customers amongst the various rates to prevent any unintended consequences of the migration of customers between rates and to properly allocate their share of the revenue requirement in its FMCA Tracker Filing."

¹ Total Margin per the Revenue Proof and Rate Design table in the Verified Settlement Testimony of Erin E. Whitehead, Attachment 2-S-A , Cause No. 45621, Page 1 of 4.

Cause No. 45703
Northern Indiana Public Service Company LLC's
Objections and Responses to
NIPSCO Industrial Group Data Request Set No. 2

The migration process is consistent with the treatment of migration of customers approved in Cause No. 45007 for the Pipeline Safety Compliance Project, Cause No. 45007-FMCA-3 for the PHMSA Compliance Project, and in Cause No. 45560 for the Pipeline Safety II Compliance Project.