

OFFICIAL
EXHIBITS

FILED
December 22, 2020
INDIANA UTILITY
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF SOUTHERN INDIANA GAS AND)
ELECTRIC COMPANY D/B/A VECTREN ENERGY)
DELIVERY OF INDIANA, INC., A CENTERPOINT)
ENERGY COMPANY ("VECTREN SOUTH") FOR)
APPROVAL OF A CHANGE IN ITS FUEL)
COST ADJUSTMENT FOR ELECTRIC)
SERVICE IN ACCORDANCE WITH THE)
ORDER OF THE COMMISSION IN CAUSE)
NO. 37712 EFFECTIVE JUNE 18, 1986 AND)
SENATE BILL NO. 529 EFFECTIVE APRIL 11,)
1979

CAUSE NO. 38708
FAC-129

IURC
PUBLIC'S
EXHIBIT NO. 2
1-6-21
DATE REPORTER

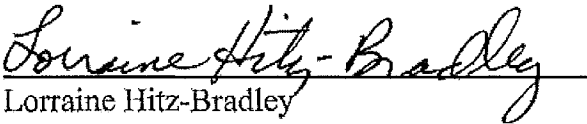
INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

PUBLIC'S EXHIBIT NO. 2

TESTIMONY OF OUCC WITNESS MICHAEL D. ECKERT

December 22, 2020

Respectfully Submitted,



Lorraine Hitz-Bradley

Attorney No. 18006-29

Deputy Consumer Counselor

TESTIMONY OF OUCC WITNESS MICHAEL D. ECKERT
CAUSE NO. 38708 FAC-129
SOUTHERN INDIANA GAS AND ELECTRIC COMPANY
("VECTREN SOUTH ELECTRIC")

I. INTRODUCTION

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

2 A: My name is Michael D. Eckert and my business address is 115 W. Washington St.,
3 Suite 1500 South, Indianapolis, IN, 46204. I am employed as an Assistant Director in
4 the Electric Division for the Indiana Office of Utility Consumer Counselor
5 ("OUCC"). My qualifications are set forth in Appendix A of this document.

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

8 A: Yes.

9 **Q:** What is the purpose of your testimony in this cause?

10 A: I discuss my analysis of Vectren South Electric's ("VSE") fuel clause adjustment
11 ("FAC") request and the (1) applicability of Commission Cause No. 43414 as it
12 relates to purchased power over the benchmark; (2) impact of contestable revenue
13 sufficiency guarantee ("RSG") charges; (3) ancillary services market ("ASM"); (4)
14 bill analysis; (5) steam generation costs; (6) actual cost of fuel (Mills/kWh)
15 comparison; (7) coal inventory; (8) line-loss adjustment; (9) wind farms; and 10)
16 commitment status. Ultimately, the OUCC recommends the Commission require
17 VSE to update the Commission in its next FAC filing on its current coal inventory
18 situation, as further described in my testimony below. The OUCC further
19 recommends the Commission approve VSE's proposed fuel cost factor as
20 recalculated and confirmed by OUCC witness Gregory T. Guerrettaz.

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

3 A: I read VSE's prefiled testimony and verified petition in this proceeding, as well as
4 relevant Commission Orders. I reviewed VSE's workpapers, VSE's responses to
5 OUCC data requests, and pertinent sections of Title 8 of the Indiana Code and Title
6 170 of the Indiana Administrative Code. I participated in meetings and conference
7 calls with VSE personnel. Due to COVID-19, the OUCC performed its field audit
8 remotely via conference call and WebEx on Monday December 14, 2020 and
9 Friday, December 18, 2020. I participated in meetings with other OUCC staff
10 members and VSE personnel in developing issues identified in this Cause.

II. PURCHASED POWER OVER THE BENCHMARK

11 **Q: Did VSE purchase any power that exceeded the purchased power benchmark**
12 **approved by the Commission in Cause No. 43414?**

13 A: Yes. VSE provided workpapers that show it incurred \$41,079.95 of purchased
14 power costs that exceeded the benchmark during the three-month period June 2020
15 through August 2020.

16 **Q: Does the OUCC agree with VSE's calculation of purchased power over the**
17 **benchmark?**

18 A: Yes. According to the OUCC's calculations, all of VSE's purchased power that
19 exceeded the benchmark is eligible for recovery. Thus, VSE should be allowed to
20 recover \$41,079.95 of purchased power that exceeded the benchmark.

III. CONTESTABLE RSG

1 **Q: Did VSE incur contestable RSG charges for the months of June 2020, July**
2 **2020, and August 2020?**

3 A: Yes. VSE incurred \$21,244.38 in contestable RSG charges for the three-month
4 period, which are recovered through VSE's MISO Cost and Revenue Adjustment
5 ("MCRA") mechanism.

IV. ANCILLARY SERVICES MARKET ("ASM")

6 **Q: Is VSE continuing to follow the ASM ratemaking treatment authorized by the**
7 **Commission?**

8 A: Yes. VSE's current ratemaking treatment for the ASM charge types follows the
9 treatment authorized by the Commission in its Cause No. 43426 Phase II Order,
10 dated June 30, 2009.

V. BILL ANALYSIS

11 **Q: Have you calculated the bill impact on a typical residential customer's bill**
12 **using 500, 1,000, 1,500, and 2,000 kWhs at the proposed rate and compared**
13 **that to the same typical customer's bill using the currently approved rate?**

14 A: Yes. I did, as shown in the following table:

	Bill at	Bill at	Dollar	% Increase
	Proposed	Current		
<u>Consumption</u>	<u>FAC</u>	<u>FAC</u>	<u>Inc/(Dec)</u>	<u>/(Decrease)</u>
500	\$73.64	\$74.00	(\$0.35)	(0.48%)
1,000	\$136.29	\$136.99	(\$0.70)	(0.51%)
1,500	\$198.93	\$199.99	(\$1.05)	(0.53%)
2,000	\$261.58	\$262.98	(\$1.41)	(0.53%)

22 **Q: What assumptions did you make in this calculation?**

23 A: In making this calculation, I did not include any amount for other trackers, nor did
24 I include taxes. Therefore, this calculation only reflects the proposed change to the
25 FAC factor and VSE's base rates.

1 **Q: Have you provided a calculation of a typical customer's bill using 1,000 kWh**
2 **in December 2020?**

3 A: Yes. See Attachment MDE-3. A typical residential customer using 1,000 kWh in
4 December 2020 will pay (excluding taxes) \$158.72 (15.87 cents per kWh). This
5 amount consists of \$146.24 in base charges that were set during VSE's last rate
6 case (Cause No. 43839), (\$9.25) in fuel adjustment clause charges, and \$21.73 in
7 non-FAC trackers (DSMA, CECA, ECA, MCRA, RCRA, & TDSIC).

VI. STEAM GENERATION COSTS

8 **Q: Did you do a comparison of steam generation costs for the five large Indiana**
9 **Electric Investor-Owned Utilities ("IOUs")?**

10 A: Yes. VSE's steam generation costs are comparable to the other Electric IOUs in the
11 State of Indiana (See Attachment MDE-1).

VII. ACTUAL COST OF FUEL (MILLS/KWH) COMPARISON

12 **Q: Did you do a comparison of the actual monthly cost of fuel (Mills/kWh) for the**
13 **five large Electric IOUs?**

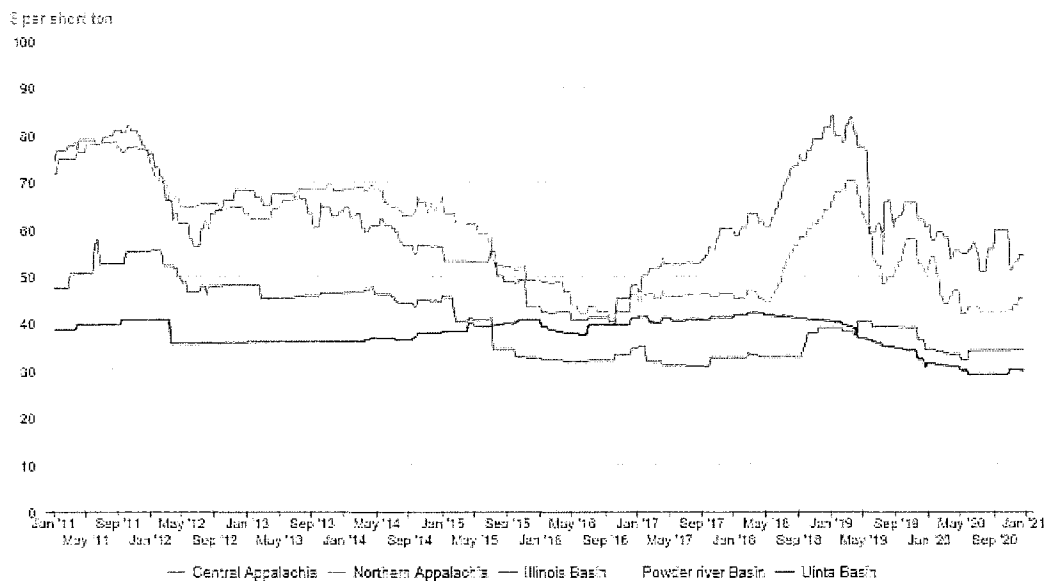
14 A: Yes. VSE's actual monthly cost of fuel (mills/kWh) is comparable to the other
15 Electric IOUs in the State of Indiana (See Attachment MDE-2).

VIII. COAL PRICE REVIEW

16 **Q: Has the OUCC been reviewing weekly historical coal prices on an MMBtu**
17 **basis and dollar basis?**

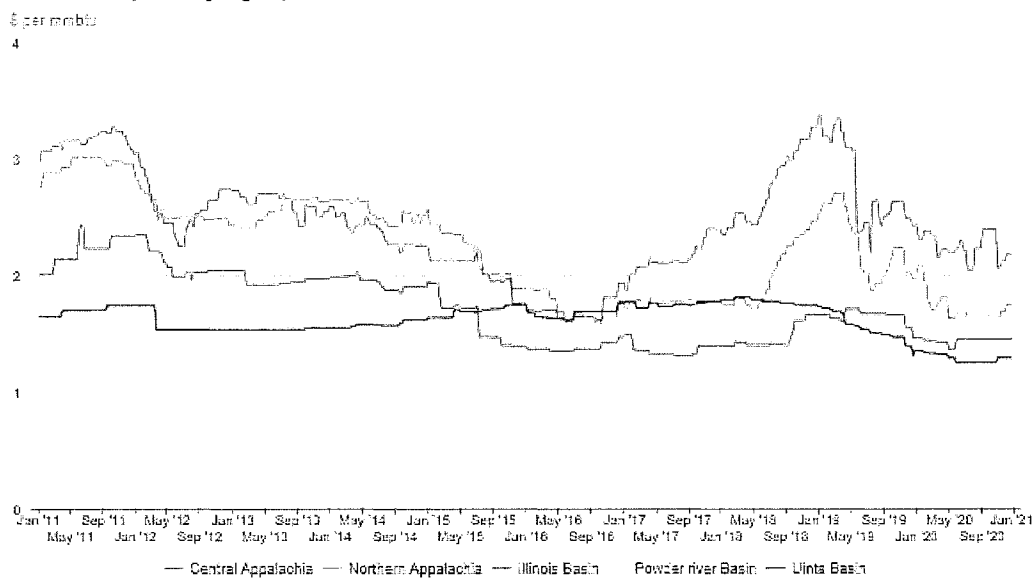
18 A: Yes. The OUCC monitors weekly historical coal prices as published by the U.S.
19 Energy Information Administration ("EIA") on SNL Energy. The two EIA graphs
20 below depict the historical price of coal on a MMBtu basis and a dollar basis.

Historic coal prices by region, 2011 - current data



eia Source: EIA Energy

Historic coal prices by region, 2011 - current data



eia Source: U.S. Energy Information Administration, based on EIA Energy

IX. COAL INVENTORY

1 **Q: What is the current level of VSE's coal inventory?**

2 A: VSE's coal inventory as of December 31, 2019 was 663,7526 tons. By June 30,
3 2020, VSE's coal inventory increased to 858,262 tons and as of September 30, 2020
4 its coal inventory decreased to 837,696 tons. VSE's forecast shows its coal
5 inventories are projected to increase over the next quarter and its coal purchases are
6 slightly higher than its projected coal burn.

7 **Q: Have VSE's coal generating station inventory piles reached their maximum**
8 **level?**

9 A: As of September 2020, VSE's coal generating station piles are below the maximum
10 level of (approximately 800,000 tons). Consequently, VSE continues to implement
11 its coal decrementation policy, as discussed further below.

12 **Q: Did anything come to your attention during the FAC audit that may impact**
13 **VSE's coal inventory?**

14 A: Yes. VSE believes the following reasons are impacting its 2020 coal burn: 1) low
15 natural gas prices; 2) low purchase power prices; 3) weather; and 4) decreased
16 demand due to closings as a result of the Coronavirus.

17 **Q: Is VSE actively trying to manage its coal purchases and coal inventory?**

18 A: Yes. VSE indicated in discussions with the OUCC it has taken actions to address
19 its increase in coal inventory.

20 **Q: Should VSE continue to update the Commission on its coal inventory?**

21 A: Yes. VSE should continue to provide the inputs to its calculation of the coal
22 inventory. In addition, VSE should update the Commission on its 2020 and 2021
23 projected coal burn and coal purchases. Furthermore, the OUCC recommends VSE
24 update the Commission on how it proposes to address its increase in coal inventory.

X. COAL DECREMENT PRICING

1 **Q: Is VSE currently utilizing coal decrement pricing?**

2 A: Yes. Coal decrement pricing involves bidding coal units into the MISO market
3 below cost so they will be more competitive, more likely to be dispatched, and
4 avoid expenses associated with off-site storage of excess coal inventory. VSE
5 began utilizing the coal price decrement on March 18, 2020.

6 **Q: What does the OUCC recommend?**

7 A: The OUCC recommends VSE file testimony, schedules, and workpapers to justify
8 any actual or anticipated need for coal decrement pricing in future FAC filings.

XI. LINE-LOSS ADJUSTMENT

9 **Q: Did you review VSE's line-loss calculation to determine if it complied with the**
10 **Commission's Cause No. 38708 FAC-91 and FAC-92 Orders?**

11 A: Yes. VSE complied with the Commission's Cause No. 38708 FAC-91 and FAC-
12 92 Orders regarding line-loss calculations.

XII. WIND FARMS

13 **Q: Did you ask VSE personnel about Benton County Wind Farm ("BCWF") and**
14 **Fowler Ridge II ("FRII") regarding negative Locational Marginal Prices**
15 **("LMPs")?**

16 A: Yes. VSE experienced negative LMPs with BCWF and FRII and is monitoring the
17 situation.

XIII. UNIT COMMITMENT STATUS

18 **Q: Does the OUCC review VSE's unit commitment status during its FAC audit?**

19 A: Yes. The OUCC generally reviews VSE's unit commitment status and Mr.
20 Guerrettaz's testimony details some of the analysis done by the OUCC during its

1 FAC audit. In general, the OUCC's FAC audit process has focused more on the
2 cost of fuel and the cost of purchased power.

XIV. RECOMMENDATION

3 **Q: What does the OUCC recommend?**

4 A: The OUCC recommends the Commission:

- 5 1) Approve VSE's proposed fuel cost factors as recalculated and confirmed by
6 Mr. Guerrettaz;
- 7 2) Continue to monitor and require VSE to update the Commission on the
8 status of its fuel cost, coal inventory, and its mix of power supply sources
9 in its next FAC filing;
- 10 3) Require VSE to update the Commission regarding its coal procurement
11 practices, coal requests for proposals, coal price reopeners, and any coal
12 contract changes through its FACs;
- 13 4) Require VSE to update the Commission on its current coal inventory
14 situation and 2020 and 2021 projected coal burn and coal purchases; and
- 15 5) Require VSE to provide the inputs to its calculation of the coal price
16 decrement, and the reasons for any use of decrement pricing.

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

18 A: Yes, it does.

APPENDIX A – QUALIFICATIONS OF MICHAEL D. ECKERT

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

2 A: I graduated from Purdue University in West Lafayette, Indiana in December 1986,
3 with a Bachelor of Science degree, majoring in Accounting. I am licensed in the
4 State of Indiana as a Certified Public Accountant. Upon graduation, I worked as a
5 Field Auditor with the Audit Bureau of Circulation in Schaumburg, Illinois until
6 October 1987. In December 1987, I accepted a position as a Staff Accountant with
7 the OUCC. In May 1995, I was promoted to Principal Accountant and in December
8 1997, I was promoted to Assistant Chief Accountant. As part of the OUCC's
9 reorganization, I accepted the position of Assistant Director of its
10 Telecommunications Division in July 1999. From January 2000 through May 2000,
11 I was the Acting Director of the Telecommunications Division. As part of an OUCC
12 reorganization, I accepted a position as a Senior Utility Analyst. In September 2017
13 I became an Assistant Director in the Electric Division. As part of my continuing
14 education, I have attended the National Association of Regulatory Utility
15 Commissioners ("NARUC") two-week seminar in Lansing, Michigan. I attended
16 NARUC's Spring 1993 and 1996 seminar on system of accounts. In addition, I
17 attended several CPA sponsored courses and the Institute of Public Utilities Annual
18 Conference in December 1994 and December 2000.

AFFIRMATION

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

A handwritten signature in black ink, appearing to read "Michael D. Eckert", is written over a horizontal line.

By: Michael D. Eckert
Assistant Director of the Electric Division
Indiana Office of Utility Consumer Counselor

Cause No. 38708 FAC-129
Vectren South

Date: December 22, 2020

Vectren South
Cause No. 38708 FAC - 129

Steam Generation Cost Comparison

Month	Year	Duke Energy	Indiana Michigan Power	Indianapolis Power & Light	NIPSCO	Vectren South	Month	Year	Duke Energy	Indiana Michigan Power	Indianapolis Power & Light	NIPSCO	Vectren South
January	2007	**	\$17.170	\$13.258	\$19.628	\$20.067	January	2014	25.529	24.550	29.414	28.097	
February	2007		16.302	13.658	19.596	20.069	February	2014	27.393	24.538	32.326	28.048	
March	2007		17.037	13.241	19.639	19.883	March	2014	23.107	23.463	31.978	27.154	
April	2007		17.769	13.688	19.540	20.585	April	2014	26.567	24.278	29.116	28.722	
May	2007		18.673	13.579	20.843	20.707	May	2014	28.489	24.487	29.296	26.666	
June	2007		16.973	14.096	20.389	20.182	June	2014	27.603	23.021	28.575	27.346	
July	2007		17.916	14.094	21.661	20.429							
August	2007		19.025	14.530	20.498	20.422	July	2014	26.952	23.416	27.969	26.762	
August	2007					20.422	August	2014	27.390	28.445	28.231	25.763	
September	2007		20.209	14.002	20.295	19.849	September	2014	21.997	30.773	28.230	26.197	
October	2007		20.572	14.038	20.777	20.904	October	2014	25.738	32.170	27.248	26.417	
November	2007		26.158	13.596	20.928	20.652	November	2014	26.728	24.532	28.011	25.478	
December	2007		20.936	13.583	21.147	21.612	December	2014	25.605	23.527	26.574	26.039	
January	2008		19.527	14.241	20.253	20.948	January	2015	27.191	23.497	25.752	27.287	
February	2008		20.362	14.706	22.090	21.970	February	2015	26.269	24.232	25.913	26.293	
March	2008		23.903	15.223	22.098	20.854	March	2015	22.549	24.195	25.525	26.750	
April	2008		20.990	14.687	22.363	22.476	April	2015	22.438	23.437	24.555	26.463	
May	2008		22.972	15.028	22.700	22.579	May	2015	25.270	23.325	25.308	25.994	
June	2008		23.708	15.694	22.885	22.903	June	2015	27.006	25.561	26.773	26.904	
July	2008		23.512	15.753	22.269	21.947	July	2015	26.312	23.672	26.544	26.387	
August	2008		26.033	16.174	22.720	21.701	August	2015	24.397	23.601	27.554	25.480	
September	2008		26.369	16.089	22.392	21.398	September	2015	17.891	23.741	26.131	26.280	
October	2008		28.047	16.990	20.222	21.922	October	2015	25.405	23.667	26.135	26.346	
November	2008		26.882	16.446	21.422	21.192	November	2015	24.520	23.089	29.840	27.464	
December	2008		25.630	16.200	22.406	21.476	December	2015	26.001	28.690	22.179	29.998	
January	2009		25.582	16.107	25.922	25.786	January	2016	26.382	22.756	29.902	28.590	
February	2009		24.000	15.711	28.132	28.839	February	2016	24.782	24.789	29.464	28.292	
March	2009		20.815	15.782	26.784	29.188	March	2016	12.691	23.912	29.439	29.261	
April	2009		23.918	15.672	26.647	30.698	April	2016	24.150	23.508	29.110	27.242	
May	2009		21.705	15.793	26.314	33.507	May	2016	24.981	23.653	28.551	27.164	
June	2009		23.730	15.295	26.048	32.740	June	2016	25.364	22.978	25.862	26.213	
July	2009		22.364	15.113	26.327	32.846	July	2016	25.592	24.093	26.559	26.252	
August	2009		20.489	15.247	25.707	33.152	August	2016	26.126	23.881	25.866	26.767	
September	2009		19.544	14.968	25.708	34.242	September	2016	26.854	23.757	26.956	25.976	
October	2009		22.783	15.046	25.820	31.128	October	2016	25.295	25.603	27.421	25.344	
November	2009		22.076	14.985	26.323	33.328	November	2016	26.251	23.529	27.415	27.014	
December	2009		22.543	15.117	27.094	33.067	December	2016	25.324	24.034	26.265	26.114	
January	2010		21.322	15.724	27.370	31.800	January	2017	24.234	23.289	26.796	25.785	
February	2010		20.569	17.057	26.853	32.762	February	2017	25.272	23.028	26.318	26.177	
March	2010		22.576	18.453	25.518	32.732	March	2017	18.832	21.687	27.503	25.618	
April	2010		22.109	18.843	26.032	33.361	April	2017	24.427	23.770	28.401	26.435	
May	2010		22.244	19.988	25.762	34.854	May	2017	24.615	23.800	29.785	25.270	
June	2010		22.853	20.389	27.820	32.529	June	2017	24.941	22.189	28.828	24.834	
July	2010		24.191	20.687	32.402	33.720	July	2017	24.333	22.378	27.586	25.042	
August	2010		25.663	21.080	26.834	33.480	August	2017	24.583	23.027	26.420	25.339	
September	2010		24.650	20.705	26.115	34.401	September	2017	24.531	23.494	25.583	26.558	
October	2010		22.395	21.082	26.942	34.857	October	2017	20.555	24.385	24.418	26.092	
November	2010		22.491	21.118	26.585	35.410	November	2017	24.661	23.090	27.061	26.360	
December	2010		22.659	20.555	28.795	35.591	December	2017	23.847	23.840	25.733	26.961	
January	2011		20.956	20.753	27.896	35.043	January	2018	23.180	22.415	26.382	26.764	
February	2011		22.068	21.425	28.394	35.582	February	2018	25.057	22.815	28.280	26.907	
March	2011		24.766	21.651	29.036	36.068	March	2018	20.209	22.083	26.959	26.656	
April	2011		23.263	22.169	29.308	37.562	April	2018	24.048	21.120	27.127	25.571	
May	2011		23.302	21.442	28.825	35.813	May	2018	23.933	22.590	24.337	26.095	
June	2011		23.935	22.420	29.311	35.859	June	2018	25.669	21.705	24.064	26.096	
July	2011		24.189	22.527	29.875	36.551	July	2018	25.526	21.817	25.030	25.669	
August	2011		23.782	23.009	29.334	35.493	August	2018	24.755	22.268	27.141	25.227	
September	2011		23.088	22.088	27.931	36.721	September	2018	26.052	21.867	26.613	25.425	
October	2011		23.970	22.163	27.925	37.020	October	2018	18.367	21.395	26.252	25.825	
November	2011		23.311	22.263	26.560	38.509	November	2018	24.338	23.050	25.631	25.805	
December	2011		21.902	22.376	26.644	38.877	December	2018	25.841	21.380	24.654	26.225	
January	2012		21.278	21.584	26.283	27.727	January	2019	27.252	21.678	26.527	26.319	
February	2012		21.571	22.496	24.679	26.060	February	2019	28.353	21.415	27.631	26.192	
March	2012		26.117	21.941	24.520	25.741	March	2019	22.088	22.505	25.570	24.653	
April	2012		21.401	23.745	24.526	26.097	April	2019	26.946	21.771	24.720	24.620	
May	2012		21.419	23.965	25.157	25.037	May	2019	27.450	22.668	24.365	24.981	
June	2012		22.167	22.958	26.526	25.572	June	2019	28.017	21.700	24.427	25.731	
July	2012		22.455	25.210	27.584	25.854	July	2019	25.638	20.550	24.218	24.456	
August	2012		22.751	24.524	27.429	26.735	August	2019	26.093	20.107	23.645	24.936	
September	2012		21.266	23.399	26.974	28.336	September	2019	26.601	20.371	23.086	24.475	
October	2012		21.222	23.124	26.595	28.630	October	2019	26.979	19.891	24.856	25.012	
November	2012		22.161	22.904	25.797	28.008	November	2019	27.029	20.701	24.098	24.902	
December	2012		22.868	22.894	25.730	29.143	December	2019	27.624	19.249	23.921	25.989	
January	2013		24.306	23.140	28.319	29.340	January	2020	39.156	20.278	24.143	24.714	
February	2013		25.587	22.911	27.123	28.796	February	2020	27.154	19.399	25.026	25.625	
March	2013		25.487	22.800	27.074	28.431	March	2020	15.799	18.525	25.307	26.131	
April	2013		24.394	23.318	28.563	29.049	April	2020	25.067	(0.211)	26.145	27.705	
May	2013		26.229	22.910	28.938	28.567	May	2020	27.314	37.614	30.549	26.225	
June	2013		26.294	24.314	28.394	28.089	June	2020		19.931	27.363	25.008	
July	2013		25.817	23.734	28.072	28.035	July	2020		19.821	24.607	24.803	
August	2013		25.693	24.479	27.054	28.219	August	2020			23.200	25.166	
September	2013		23.863	23.218	26.685	28.022	September	2020			23.573		
October	2013		26.216	23.472	26.844	27.719							
November	2013		25.848	23.232	27.822	28.231							
December	2013		26.081	24.007	27.499	28.142							

*** Information was obtained from the profiled applications of the identified companies.

Actual Cost of Fuel (AllLskWh) Comparison

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Vectren South
38708 FAC 129

December 2020 Residential Customer Bill using 1,000 kWh

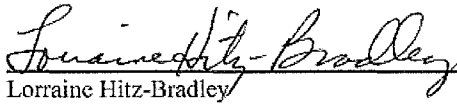
Line No.	Description:	kWh	Rate	\$	% of Bill
1	Customer Charge			\$11.00	6.93%
2	Energy Charge	1,000	\$0.091600	91.60	57.71%
3	Fuel Charge	1,000	\$0.038890	38.89	24.50%
4	Variable Production Charge	1,000	\$0.004750	4.75	2.99%
5	Fuel Adjustment Clause	1,000	(\$0.009249)	(9.25)	-5.83%
6	Demand Side Management Adjustment	1,000	\$0.008224	8.22	5.18%
7	Clean Energy Cost Adjustment	1,000	\$0.000615	0.62	0.39%
8	Environmental Cost Adjustment	1,000	\$0.006441	6.44	4.06%
9	MISO Cost and Revenue Adjustment	1,000	\$0.004041	4.04	2.55%
10	Reliability Cost and Revenue Adjustment	1,000	\$0.000352	0.35	0.22%
11	Transmission, Distribution, and Storage System Improvement Charge	1,000	\$0.002057	2.06	1.30%
12	Total Billing Amount (Excluding Taxes)			<u>158.72</u>	<u>100.00%</u>
13	Base Charge (Line 1, 2,3 and 4)			\$146.24	92.14%
14	Non-FAC Trackers (Lines 6, 7, 8, 9, 10, & 11)			21.73	13.69%
15	FAC (Line 5)			(9.25)	-5.83%
16	Total			<u>\$158.72</u>	<u>100.00%</u>

Note: Per online tariffs as of December 21, 2020, <https://www.vectren.com/information/rates>

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing *Indiana Office of Utility Consumer Counselor Public's Exhibit No. 2 Testimony of OUCC Witness Michael D. Eckert* has been served upon the following counsel of record in the captioned proceeding by electronic service on December 22, 2020.

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