

# OFFICIAL EXHIBITS

Duke Energy Indiana's position is that the EDG measurement method it has proposed is consistent with the EDG statute. It is possible that other forms of netting like monthly, weekly and daily netting may also be allowed under the EDG statute. However, for the various reasons outlined in both Duke Energy Indiana's testimony in this case and the Order in Cause No. 45378, it is Duke Energy Indiana's opinion that its proposed method most closely aligns with the intent of the EDG statute and the public interest.

In its "instantaneous netting" proposal, Duke Energy Indiana's meters would have approximately 4,096 measurements per second.

IURC  
INTERVENOR'S *Indiana*  
EXHIBIT NO. *EX-1*  
DATE *11-1-21* REPORTER *AT*  
*DG*

IndianaDG  
IURC Cause No. 45508  
Data Request Set No. 2  
Received: August 20, 2021

IndianaDG 2.5

**Request:**

Does Duke Energy Indiana have an 8760-hour load profile representative of one or more customer classes (e.g., Residential) specific to its net metering customers or its distributed generation customers? If yes, please provide an executable version of all of the load profiles. If no, please explain why not.

**Response:**

No, Duke Energy Indiana does not maintain this information in the normal course of business.

IndianaDG  
IURC Cause No. 45508  
Data Request Set No. 2  
Received: August 20, 2021

IndianaDG 2.12

**Request:**

Confirm or refute that if a Duke Energy Indiana EDG customer moves from their existing premises and at that time has an Excess DG credit balance:

- (a) The DG customer will not be permitted to “cash out” their remaining EDG credit balance (i.e., receive financial compensation from Duke Energy Indiana for an amount equal to their remaining EDG credit balance).
- (b) The DG customer will maintain their existing EDG credit balance and be able to apply such a credit balance against future bills if the new premise to which they move is located within Duke Energy Indiana’s service territory.

**Objection:**

Duke Energy Indiana objects to this data request as vague and ambiguous.

**Response:**

Subject to and without waiving or limiting its objections and assuming this request seeks information regarding any unused credits under the Company’s proposed Rider 54, please see Duke Energy Indiana’s Excess Distributed Generation Tariff under “Billing”, section 4) which states, “When customer elects to discontinue Net Metering service, any unused credit will be granted to the Company”.

IndianaDG  
IURC Cause No. 45508  
Data Request Set No. 2  
Received: August 20, 2021

IndianaDG 2.18

**Request:**

Confirm or deny that Duke Energy Indiana is currently a summer-peaking utility (i.e., it experiences its highest demand during an hour in the summer months).

**Response:**

Duke Energy Indiana is currently summer peaking.