FILED
September 12, 2023
INDIANA UTILITY
REGULATORY COMMISSION

VERIFIED DIRECT TESTIMONY OF ALISON M. BECKER

Q1. Please state your name, business address and job title.

A1. My name is Alison M. Becker. My business address is 150 W. Market Street, Suite 600, Indianapolis, Indiana 46204. I am employed by Northern Indiana Public Service Company LLC ("NIPSCO") as Manager of Regulatory Policy.

Q2. Please summarize your educational and employment background.

A2. I graduated from the University of Evansville with a Bachelor of Arts degree with a double major in History and Political Science and a Master of Business Administration from Valparaiso University and am a 2016 graduate of the Indiana University Robert H. McKinney School of Law. I was a Governor's Fellow from 1997 to 1998 and then worked as a Budget Analyst for the Indiana State Budget Agency from 1998 to 2000. In 2000, I joined the Indiana Family and Social Services Administration as the Director of Fiscal Services for the Division of Disability, Aging and Rehabilitative Services and was promoted to the Director of Developmental Disabilities Services in 2003. From 2004 until 2008, I held management positions within nonprofit organizations providing services to individuals with developmental disabilities and community health centers. I joined NiSource in 2008 as a Lead Performance Measurement Analyst in

Information Technology Service Performance. After leaving the NIPSCO briefly in 2008, I accepted the position of Senior Analyst, Regulatory Policy for NIPSCO in 2009 and was promoted to my current position as Manager, Regulatory Policy in 2011.

Q3. What are your responsibilities as Manager of Regulatory Policy?

A3. As Manager of Regulatory Policy, I am and/or have been responsible for supporting a variety of regulatory initiatives before the Indiana Utility Regulatory Commission ("Commission") including: NIPSCO's electric and gas low income filings; NIPSCO's electric and gas demand side management and energy efficiency filings; NIPSCO's electric and gas Transmission, Distribution, and Storage System Improvement Charge ("TDSIC") filings; NIPSCO's electric vehicle and economic development pilot approved in Cause No. 44016; the development, negotiation and filing of NIPSCO's demand response tariffs approved in Cause No. 43566-MISO-1; and the development of revised line extension practices governing residential real estate developments as approved by the Commission in Cause No. 43706. I also served as Chair of the Demand Side Management Coordination Committee and as a member of its subcommittees, as created in the Commission's December 9, 2009 Phase II Order in Cause No. 42693 ("Phase II Order").

Q4. Have you previously testified before this or any other regulatory commission?

A4. Yes. I previously submitted testimony in NIPSCO's electric rate case in Cause No. 45772. I also supported NIPSCO's request for a Certificate of Public Convenience and Necessity ("CPCN") (1) for federally mandated projects associated with NIPSCO's proposed compliance projects in (a) Cause No. 45183 (PHMSA Compliance Project), (b) Cause No. 45560 (Pipeline Safety II Compliance Project), (c) Cause No. 45700 (Michigan City Ash Pond Compliance Project), (d) Cause No. 45703 (Pipeline Safety III Compliance Project), and (e) Cause No. 45797 (Schahfer Ash Pond Compliance Project), and (2) to purchase and acquire (indirectly through a joint venture structure) a solar joint venture (Gibson Project) in Cause No. 45926. I also previously testified before the Commission in (1) NIPSCO's request for approval of its electric TDSIC plan for eligible transmission, distribution, and storage system improvements currently pending in Cause No. 45557; (2) NIPSCO's request for approval of its gas TDSIC plan for eligible transmission, distribution, and storage system improvements approved in Cause No. 45330; (3) NIPSCO's Electric TDSIC tracker proceedings in Cause Nos. 44733-TDSIC-X (including Cause No. 44733-TDSIC-1-S1); (4) NIPSCO's Gas TDSIC tracker proceedings in Cause Nos. 44403-TDSIC-X (beginning in TDSIC-6) and 45330-TDSIC-X (beginning in TDSIC-1); (5) NIPSCO's request in Cause No. 45465

for approval of a Low Income Program; and (6) a complaint brought by Thermo-Cycler Industries, Inc. in Cause No. 45163. I also routinely testify before the Commission in NIPSCO's requests for approval of electric and gas demand side management and energy efficiency programs, including Cause Nos. 44001, 44154, 44362, 44441, 44496, 44501, 44634, 44637, 45011, 45012, 45455, 45456, 45849, and 45850, as well as NIPSCO's adjustment filings in Cause Nos. 43618-DSM-XX and 44001-GDSM-XX.

Q5. What is the purpose of your direct testimony in this proceeding?

A5. The purpose of my direct testimony is to support NIPSCO's request for a CPCN to construct a natural gas combustion turbine ("CT") peaker plant (the "CT Project") on available property at NIPSCO's R.M. Schahfer Generating Station site. Specifically, I (1) provide an overview of NIPSCO's request in this proceeding, (2) explain how NIPSCO has supported the statutory requirements for the issuance of a CPCN, including financial incentives, under Ind. Code §§ 8-1-8.5-4, 8-1-8.5-5, and 8-1-8.8-11, (3) explain how NIPSCO has supported the requirements set out in Ind. Code § 8-1-2-0.6, and (4) explain how NIPSCO has addressed the guidelines for additional evidence to be provided pursuant to IURC GAO 2022-01. As it relates to the statutory requirements set out in Ind. Code § 8-1-8.5-4, I address the requirement to consider conservation and load management (Ind. Code § 8-1-8.5-

4(2)).

Q6. Are you sponsoring any attachments to your direct testimony?

A6. Yes. I am sponsoring Attachment 1-A through Attachment 1-G, all of which were prepared by me or under my direction and supervision. Attachment 1-A is NIPSCO's Verified Petition initiating this Cause.

OVERVIEW OF NIPSCO'S REQUEST

Q7. Please provide an overview of NIPSCO's request in this proceeding.

A7. In this proceeding, NIPSCO requests (1) issuance of a CPCN to construct the CT Project; (2) approval of the CT Project as a clean energy project and authorization for financial incentives, including timely cost recovery through construction work in progress ratemaking under Ind. Code § 8-1-8.8-11; (3) authority to recover costs incurred in connection with the CT Project; (4) approval of the best estimate of costs of construction associated with the CT Project; (5) authority to implement a Generation Cost Tracker ("GCT") Mechanism; (6) approval of changes to NIPSCO's Electric Service Tariff relating to the proposed GCT Mechanism; (7) approval of specific ratemaking and accounting treatment for the CT Project; and (8) ongoing review of the CT Project, all pursuant to Ind. Code ch. 8-1-8.5 and 8-1-8.8 and Ind. Code §§ 8-1-2-0.6, and 8-1-2-23.

STATUTORY REQUIREMENTS

Q8. Has NIPSCO provided sufficient evidence to support the statutory requirements for the issuance of a CPCN under Ind. Code §§ 8-1-8.5-4, 8-1-8.5-5, and ch. 8-1-8.8?

A8. Yes. Attachment 1-B shows each element of Ind. Code §§ 8-1-8.5-4, 8-1-8.5-5, and ch. 8-1-8.8 and identifies the NIPSCO witness sponsoring supporting testimony related to each element.[1]

Q9. Has NIPSCO provided testimony in this Cause to support the requirements set out in Ind. Code § 8-1-2-0.6?

A9. Yes. Ind. Code § 8-1-2-0.6 is the codification of the Five Pillars (reliability, affordability, resiliency, stability, and environmental stability) recommended by the 21st Century Energy Policy Development Task Force ("Task Force") in its November 2020 Final Report. The Task Force recommended these Pillars serve as the lens through which policy decisions about Indiana's generation resource mix should be made. IURC GAO 2023-04 specified the proceedings in which case-in-chief testimony on the Five Pillars within Ind. Code § 8-1-2-0.6 is encouraged. Attachment 1-C shows each of the Five Pillars and identifies the NIPSCO witness

[1] For convenience, Attachment 1-B is also attached to NIPSCO's Verified Petition as Attachment C.

sponsoring supporting testimony related to each pillar.[2]

Q10. Has NIPSCO followed the guidelines for additional evidence in electric generation proceedings established in the Commission's General Administrative Order 2022-01 ("GAO 2022-01")?

A10. Yes. GAO 2022-01 provides guidelines for additional evidence to be provided in connection with certain petitions regarding electric generation under Ind. Code chs. 8-1-8.5 and 8-1-8.8. Attachment 1-D provides the required information as it pertains to NIPSCO's request for approval under Ind. Code chs. 8-1-8.5 and 8-1-8.8 in this Cause. Attachment 1-G is the Affidavit of Andy Witmeier, Director of Resource Utilization for the Midcontinent Independent System Operator, Inc. ("MISO"), providing a qualitative assessment provided by MISO regarding the new generation, including NIPSCO's request to MISO (Exhibit 1 to the Affidavit).

Q11. Has NIPSCO followed the guidelines applicable to applications for a CPCN established in the Commission's General Administrative Order 2023-03 ("GAO 2023-03")?

A11. Yes. GAO 2023-03 provides guidelines that apply to all applications for CPCNs and related docketed proceedings. Attachment 1-E is NIPSCO's letter to the

[2] For convenience, Attachment 1-C is also attached to NIPSCO's Verified Petition as Attachment B.

Secretary of the Commission dated August 11, 2023 (at least 30 days prior to the expected date of the filing) providing notice of its intent to file an application for a CPCN, thereby helping to avoid *ex parte* issues regarding a pending proceeding. NIPSCO also met to discuss its filing with the Commission on May 8, 2023, the Indiana Office of Utility Consumer Counselor ("OUCC") on May 24, 2023, and Citizens Action Coalition of Indiana, Inc. ("CAC") on July 12, 2023. Attachment 1-F is an index of issues and identification of the witness(es) addressing each of the issues.[3]

CONSERVATION AND LOAD MANAGEMENT

Q12. Please discuss the requirement under Ind. Code § 8-1-8.5-4(b)(2) regarding the consideration of "[o]ther methods for providing reliable, efficient, and economical electric service, including the refurbishment of existing facilities, conservation, load management, cogeneration, and renewable energy sources."

A12. As discussed above, other NIPSCO witnesses are addressing the refurbishment of existing facilities, cogeneration, and renewable energy sources, while I address conservation and load management. NIPSCO addresses conservation and load management through its existing demand response programs and demand side

[3] For convenience, Attachment 1-F is also attached to NIPSCO's Verified Petition as Attachment A.

management / energy efficiency ("DSM/EE").

Q13. Please describe NIPSCO's existing demand response programs.

A13. NIPSCO currently has three demand response programs: (1) options within NIPSCO's Rate 531 whereby large industrial customers qualify as a Load Modifying Resource ("LMR"), (2) a Demand Response Resource offering under Rider 581 allowing industrial customers the opportunity to offer a load reduction into the MISO Market as energy, and (3) an Emergency Demand Response Resource offering under Rider 582 allowing industrial customers the opportunity to offer a load reduction into the MISO Market as energy for use only during emergency operations.

Q14. Do these demand response programs qualify as demand response programs for purposes of MISO's Tariff Module E-1?

A14. Options within NIPSCO's Rate 531 qualify as an LMR under MISO's Tariff Module E-1, which allows NIPSCO to receive Zonal Resource Credits for use against its Planning Reserve Margin Requirement obligation. Under Riders 581 and 582, NIPSCO offers energy only Demand Response Resource and Emergency Demand Response Resource, which do not qualify under MISO's Tariff Module E-1 since they are energy only and do not have the "must offer" obligation required to be

awarded Zonal Resource Credits.

Q15. Did NIPSCO consider DSM/EE and associated demand response as a resource in its 2021 IRP?

A15. Yes. NIPSCO considered DSM/EE and associated demand response as a resource in its 2021 IRP. These two components are part of a balanced utility resource plan.

Q16. Please describe the difference between DSM/EE and demand response resources.

A16. Both strategies involve the management of energy demand. With energy efficiency, the goal is to reduce the amount of energy consumed. It is an ongoing approach that involves a more efficient use of power. For demand response, the goal is to balance the supply and demand equation. It can be as simple as temporarily reducing power during periods of high demand by turning up the thermostat or turning off non-essential operations.

Q17. Please describe NIPSCO's experience in offering DSM/EE programs.

A17. NIPSCO has been offering DSM/EE programs since 2010, first through the Core Programs created by the Phase II Order and then through Core Plus programs approved by the Commission in Cause No. 43912. Currently, NIPSCO offers a robust portfolio of residential and commercial and industrial ("C&I") programs.

NIPSCO has a plan covering the period 2024-2026 currently pending before the Commission in Cause No. 45849. If approved, NIPSCO will offer 12 programs for residential customers, with an anticipated savings of 137,468 megawatt hours ("MWh") over the three-year period. In addition, six C&I programs will be offered, with an anticipated savings of 229,613 MWh over the three-year period. The plan also includes 8,041 MWh in "emerging technology" savings, for a total of 375,122 MWh over the three-year period. This amount is consistent with what the model selected in NIPSCO's 2021 IRP. In addition, the settlement agreement reached among NIPSCO, the OUCC,, and the CAC contemplates up to 45,015 MWh in additional savings over the three-year period through the use of flexible funding.

Q18. Have NIPSCO's DSM/EE programs been successful?

A18. Yes. NIPSCO's DSM/EE programs have proven to be cost-effective and successful in terms of performance, as determined through the implementation and evaluation process.

Q19. How did NIPSCO model DSM/EE as a resource in its 2021 IRP?

A19. NIPSCO carried out a lengthy analysis of the DSM/EE resources included in its IRP process. NIPSCO completed a market potential study ("MPS") to determine

the achievable amount of savings. NIPSCO, through the MPS process, then conducted an in-depth review of the amount of savings that would be achievable in its service territory with its current customer base. Following that in-depth review process, NIPSCO incorporated the achievable potential identified in the MPS into the 2021 IRP. For the IRP Resource Selection Model, the realistic achievable potential ("RAP") identified in the MPS was initially developed into three sector-based bundles of energy efficiency savings: residential, commercial/industrial, and income-qualified. These aggregate bundles were based on coordination between NIPSCO and the NIPSCO Oversight Board ("OSB").

The residential and C&I bundles were modeled as selectable resources in the IRP capacity expansion model. Due to concerns of overall residential sector bundle costs, and to eliminate the possibility that the entire residential sector energy efficiency bundle would not get selected in the IRP model, a small amount of high-cost residential energy efficiency measures was grouped into a separate (fourth) bundle to increase the likelihood that the remaining low-medium cost residential energy efficiency savings bundle would get selected.

NIPSCO allowed DSM/EE measures to be selected across all six portfolio concepts. Ultimately, all energy efficiency savings bundles, except for the smaller "high-cost" residential measures bundles, were selected for inclusion in NIPSCO's 2021 IRP.

Finally, with the assistance of Integral Analytics, Inc., NIPSCO completed its own additional analysis that indicated that the energy efficiency goals are achievable in a cost effective manner based on NIPSCO's traditional DSM cost-benefit tests. All the bundles that were selected by the model in NIPSCO's 2021 IRP are included in the 2024-2026 Plan. The 2024-2026 Plan is consistent with the findings of its 2021 IRP.

Q20. How did NIPSCO develop assumptions and integrate DSM/EE in its 2021 IRP?

A20. NIPSCO contracted with GDS Associates, Inc. ("GDS") to conduct the MPS (Appendix B to the 2021 IRP),[4] which provided DSM/EE program costs and savings for a 20-year time horizon (2024-2043). The report captures the insights from NIPSCO's prior MPS as well as NIPSCO's 2024-2026 Plan. The objectives of the MPS included primary market research and a comprehensive review of current programs, historical savings, and projected energy savings opportunities to

[4] The 2021 IRP is attached to NIPSCO Witness Augustine's direct testimony as Attachment 7-A.

develop estimates of technical, economic, and achievable potential.

For the IRP analysis to evaluate DSM on a consistent and comparable basis with supply-side resources, the DSM potential defined by the MPS needed to be disaggregated into smaller bundles with supply-side characteristics that act as model inputs. Based on coordination between NIPSCO and the NIPSCO OSB, the GDS team initially provided energy efficiency inputs at the aggregate sector level to minimize the chances that the IRP would only select a subset of the cheapest measures and limit NIPSCO's ability to offer broad programs.

NIPSCO used the RAP identified in the MPS as the starting point for developing energy efficiency bundles to be modeled in the IRP. The GDS Team provided the energy efficiency IRP inputs across three sector categories (residential, income-qualified, and commercial/industrial). The residential and commercial/industrial bundles were modeled as selectable resources in the IRP capacity expansion model. The income-qualified bundle was treated as a 'going-in' resource as the high costs of program delivery would likely prevent its selection in the IRP, and

NIPSCO anticipates continuing to offer energy efficiency programs to its income-qualified customer despite these limitations in cost effectiveness.[5]

In addition to the sector segmentation, the three different vintage bundles: 2024-2029, 2030-2035, and 2036-2041 allow the model to optimize the value of energy efficiency to the system over different time periods. Following a review of these initial cost and savings inputs, the GDS Team further segmented the residential sector savings into high-cost measures (Tier 2) and low/mid cost measures (Tier 1) across each vintage time-series.

In addition, three adjustments to the MPS' realistic achievable energy efficiency potential savings and one direct adjustment to costs were necessary prior to inclusion in the IRP. The first adjustment converted the energy efficiency achievable potential from gross savings to net savings. The second savings adjustment was to provide the program potential savings at the generator level. The third adjustment aligned the level of income-qualified potential, identified in the realistic achievable potential, with levels achieved historically by NIPSCO. The MPS assumed NIPSCO pays near full cost for all possible income-qualified

[5] Note that the IQW bundle represents approximately 1 MW of summer peak savings and less than 1 MW of winter peak savings, so it represents an insignificant component of NIPSCO's overall supply-demand balance.

potential savings, regardless of cost-effectiveness. However, this produces an income-qualified budget that significantly outpaces historical spending for the income-qualified sector. As a result of aligning the income-qualified sector spending in the IRP with recent historical levels, income-qualified achievable savings were also scaled accordingly.

On the cost side, because the IRP's portfolio optimization modeling does not separately calculate the avoided transmission and distribution benefit associated with DSM measures, the GDS Team provided NIPSCO with energy efficiency costs that were adjusted to net out the avoided transmission and distribution benefit.

In addition to the annual impacts, hourly (or 8,760) shapes that reflect the various measures and end-use mix reflected in each EE resource bundle were provided to NIPSCO to permit the IRP model to assess the value of energy savings on an hourly basis. The 8,760 shapes are unique for each EE sector and vintage bundle.

Q21. What did NIPSCO and GDS use to determine its avoided costs for the purposes of screening DSM/EE measures?

A21. NIPSCO used a variety of inputs to account for energy, capacity, transmission and distribution, and ancillary costs. These inputs were updated and utilized in

determining the benefit cost test results for the filing made in Cause No. 45849.

Q22. Have stakeholders generally supported NIPSCO's approach?

A22. Yes. NIPSCO meets regularly with its OSB and trade allies and considers their input in the development of its DSM plans. NIPSCO also received and considered stakeholder input as part of the IRP stakeholder process. NIPSCO continues to build on the strong relationship it has with its OSB and works with it on program designs and vendor selection. The Director of Research, Policy and Planning for the Commission noted in his report that "NIPSCO developed its IRP with significant stakeholder input."[6] In response to the CAC, Earthjustice, and Vote Solar (Joint Commenters or "JC") comments, the Director's Report said, "The Director believes all participants in the NIPSCO IRP stakeholder advisory process have sought to incorporate lessons learned from previous IRP processes. The Director appreciates JC's commitment to continue to work to improve the advisory process. Nothing in NIPSCO's recent IRP planning exercises causes one to question the company's commitment to continued improvements."[7]

Q23. Based on your experience with EE in NIPSCO's service territory, would EE be a

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[6] Final Director's Report For Northern Indiana Public Service Company (NIPSCO) 2021 Integrated Resource Plan May 9, 2023 ("Director's Report") at 4.

[7] *Id*. at 31.

reasonable alternative to the CT Project NIPSCO is seeking authority to construct?

A23. No. The 2021 IRP modeling does demonstrate that EE will be an important part of NIPSCO's resource options in the future and will be particularly important to help mitigate against the need to build new generation to serve incremental load, as EE will ensure that some incremental load will be satisfied through energy savings rather than new generation resources. However, NIPSCO's modeling indicates the most economical option for customers over the long term is to execute on its preferred portfolio, including, but not limited to, adding the proposed CT Project in this case,[8] adding solar and wind resources, and retiring coal generation. Based on my experience with NIPSCO's EE initiatives, NIPSCO could not derive sufficient energy savings from EE to replace this generation.

Q24. What has NIPSCO done to expand its demand response offerings?

A24. NIPSCO has been working with stakeholders on additional demand response offerings for residential and C&I customers. This involves both near-term opportunities as well as longer-term options once advanced metering infrastructure has been rolled out throughout NIPSCO's electric service territory.

[8] As discussed by NIPSCO Witness Augustine, the 2023 portfolio analysis indicated a need for a gas-fired peaking unit between 400 MW and 442 MW.

NIPSCO has met with stakeholders on a potential residential offering to be available beginning in the summer of 2024, subject to Commission approval. In addition, NIPSCO has a team discussing how to offer a program to C&I customers in rates other than Rate 531, including considering aggregation. NIPSCO has continued to have discussions with the OSB on the residential program and is working on the items in the settlement agreement approved in NIPSCO's most recent rate case (Cause No. 45772) related to demand response with the appropriate parties from that agreement.

Q25. Based on your experience with demand response in NIPSCO's service territory, would demand response be a reasonable alternative to the CT Project NIPSCO is seeking authority to construct?

A25. No. Demand response would not eliminate the need for the CT Project, and, based on how such plants are constructed, would likely not reduce the size of the project. That said, NIPSCO is committed to the development of demand response programs for all customer groups and appreciates the assistance of its stakeholders in finding experts to help with that development.

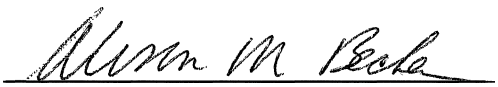
CONCLUSION

Q26. Does this conclude your prefiled direct testimony?

A26. Yes.

VERIFICATION

I, Alison M. Becker, Manager of Regulatory Policy for Northern Indiana Public Service Company LLC, affirm under penalties of perjury that the foregoing representations are true and correct to the best of my knowledge, information, and belief.



Alison M. Becker

Date: September 12, 2023

Attachment 1-A

[Verified Joint Petition – Not duplicated herein]

CT Project		
8-1-8.5-4(b)(1)(A)	Current and potential arrangement with other electric utilities for . . . interchange of power	Pet. Ex. 6 (Campbell)
8-1-8.5-4(b)(1)(B)	Current and potential arrangement with other electric utilities for . . . pooling of facilities	Pet. Ex. 6 (Campbell)
8-1-8.5-4(b)(1)(C)	Current and potential arrangement with other electric utilities for . . . purchase of power	Pet. Ex. 6 (Campbell)
8-1-8.5-4(b)(1)(D)	Current and potential arrangement with other electric utilities for . . . joint ownership of facilities	Pet. Ex. 6 (Campbell)
8-1-8.5-4(b)(2)	Other methods of providing reliable, efficient, and economical service, including . . . refurbishment of existing facilities	Pet. Ex. 7 (Augustine)
8-1-8.5-4(b)(2)	Other methods of providing reliable, efficient, and economical service, including . . . conservation, load management	Pet. Ex. 1 (Becker)
8-1-8.5-4(b)(2)	Other methods of providing reliable, efficient, and economical service, including . . . cogeneration	Pet. Ex. 6 (Campbell)
8-1-8.5-4(b)(2)	Other methods of providing reliable, efficient, and economical service, including . . . renewable energy sources	Pet. Ex. 6 (Campbell)
8-1-8.5-4(b)(3)	Federal phaseout mandates	Pet. Ex. 5 (Baacke)
8-1-8.5-4(b)(4)	Five Pillars	Pet. Ex. 2 (Walter)
8-1-8.5-5(b)(1)	Best estimates of costs of construction	Pet. Ex. 5 (Baacke)
8-1-8.5-5(b)(2)(A)	Consistent with the Commission's analysis for expansion of generating capacity, or	Pet. Ex. 2 (Walter)
8-1-8.5-5(b)(2)(B)	Consistent with a utility specific proposal under section 3(e)(1) and approved under subsection (d) and	Pet. Ex. 2 (Walter)

	consistent with the Commission's analysis	
8-1-8.5-5(b)(3)	Public convenience and necessity	Pet. Ex. 2 (Walter)
8-1-8.5-5(e)(1)(A)	The estimated costs are, to the extent practicable, the result of competitively bid engineering, procurement or construction contracts	Pet. Ex. 4 (Warren)
8-1-8.5-5(e)(1)(B)	Applicant allowed or will allow third parties to submit firm and binding bids that meet all of the specifications required so as to enable ownership to vest with NIPSCO not later than the date on which the CTs become commercially available	Pet. Ex. 5 (Baacke)
8-1-8.5-5(e)(2)(A)	Reliability	Pet. Ex. 6 (Campbell)
8-1-8.5-5(e)(2)(B)	Solicitation of competitive bids to obtain purchased power capacity and energy from alternative providers	Pet. Ex. 6 (Campbell)
8-1-8.8-2	Clean energy project	Pet. Ex. 2 (Walter)
8-1-8.8-11	Financial incentives	Pet. Ex. 2 (Blissmer)
8-1-2-10, 14, 19 & 42(a)	Other Accounting and Ratemaking Authority	Pet. Ex. 2 (Blissmer)

This index is not intended to be an exhaustive list of the applicable statutes in this proceeding. A complete account of the requested relief and applicable statutes can be found in Petitioner's case-in-chief.

Northern Indiana Public Service Company LLC ("NIPSCO")
General Administrative Order ("GAO") 2023-04 Index

GAO 2023-04 states each electric utility is encouraged to include information, discussions, and/or evidence regarding the Five Pillars codified in Ind. Code § 8-1-2-0.6 in its case-in-chief for any case filed with the Commission concerning the utility's electric generation resource mix, energy infrastructure, and/or electric service ratemaking constructs. The below index describes each of the Five Pillars and identifies the NIPSCO witness sponsoring supporting testimony on each.

Ind. Code § 8-1-2-0.6	Witness
8-1-2-0.6(1) Reliability, including: (A) the adequacy of electric utility service, including the ability of the electric system to supply the aggregate electrical demand and energy requirements of end use customers at all times, taking into account: (i) scheduled, and (ii) reasonably expected unscheduled; outages of system elements; and (B) the operating reliability of the electric system, including the ability of the electric system to withstand sudden disturbances such as electric short circuits or unanticipated loss of system components.	Pet. Ex. 2 (Walter) at Q&A 17-18 Pet. Ex. 3 (Austin) (entire testimony) Pet. Ex. 5 at (Baacke) Q&A 17 Pet. Ex. 6 (Campbell) at Q&A 20-21, 29 Pet. Ex. 7 (Augustine) at Q&A 13, 18-21, 24-28
8-1-2-0.6(2) Affordability, including ratemaking constructs that result in retail electric utility service that is affordable and competitive across residential, commercial, and industrial customer classes.	Pet. Ex. 2 (Walter) at Q&A 17-18 Pet. Ex. 4 at (Warren) at Q&A 14-22 and Conf. Att. 4-A Pet. Ex. 5 at (Baacke) Q&A 17 Pet. Ex. 6 (Campbell) at Q&A 15, 29 Pet. Ex. 7 (Augustine) at Q&A 13, 21 Pet. Ex. 8 (Blissmer) at Q&A 15, 21-23, 35
8-1-2-0.6(3) Resiliency, including the ability of the electric system or its components to: (A) adapt to changing conditions; and (B) withstand	Pet. Ex. 2 (Walter) at Q&A 17-18 Pet. Ex. 5 at (Baacke) Q&A 17

and rapidly recover from disruptions or off-nominal events.	Pet. Ex. 3 (Austin) (entire testimony) Pet. Ex. 7 (Augustine) at Q&A 13, 18-21, 24-28
8-1-2-0.6(4) Stability, including the ability of the electric system to: (A) maintain a state of equilibrium during: (i) normal and abnormal conditions; or (ii) disturbances; and (B) deliver a stable source of electricity, in which frequency and voltage are maintained within defined parameters, consistent with industry standards.	Pet. Ex. 2 (Walter) at Q&A 17-18 Pet. Ex. 3 (Austin) (entire testimony) Pet. Ex. 5 at (Baacke) Q&A 17 Pet. Ex. 7 (Augustine) at Q&A 13, 21
8-1-2-0.6(5) Environmental sustainability, including: (A) the impact of environmental regulations on the cost of providing electric utility service; and (B) demand from consumers for environmentally sustainable sources of electric generation.	Pet. Ex. 2 (Walter) at Q&A 17-18, 24-25 Pet. Ex. 5 at (Baacke) Q&A 10, 17 Pet. Ex. 7 (Augustine) at Q&A 13, 21

This index is not intended to be an exhaustive list of all witnesses who address the Five Pillars in this proceeding. A complete account of the requested relief testimony can be found in Petitioner's case-in-chief.

Northern Indiana Public Service Company LLC ("NIPSCO")
General Administrative Order 2022-01
Evidence Provided Regarding Electric Generation

GAO 2022-01 Guideline	Witness	CT Project
The name of the RTO to which the generation will be connected.	Campbell	The CT Project will be connected to NIPSCO's Schahfer 345 kV Substation in MISO. See Questions / Answers 13 through 16.
A qualitative assessment by the RTO regarding the new generation shall be requested and the RTO's response (including, as applicable, the RTO's affidavit or testimony) shall be part of the utility's case in chief.	Becker	Please see Attachment 1-E for the Affidavit of Andy Witmeier, Director of Resource Utilization for the Midcontinent Independent System Operator, Inc. ("MISO"), providing a qualitative assessment provided MISO regarding the new generation, including NIPSCO's request to MISO (Exhibit 1 to the Affidavit).
A description of the new generation's anticipated impact on the submitting utility's resource adequacy and reliability.	Campbell and Austin	The CT Project will help fulfill NIPSCO's capacity needs identified in its 2021 IRP, which was confirmed by the results of NIPSCO's 2023 portfolio analysis. See Question / Answer 19. The CT Project is expected to contribute to meeting resource adequacy requirements and contribute to the overall reliability of NIPSCO's system. See Austin Questions /Answers 18 through 23.
An explanation regarding whether the generation is required to be in the RTO's interconnection queue and, if so, its status in the queue.	Campbell	The CT Project will use MISO's Replacement Generation Interconnection Procedures. See Question / Answer 14.
A description of the generation's expected capacity factors, dispatchability, and accreditation characteristics.	Campbell	The CT Project is planned to be approximately 400 MW of nameplate capacity (ICAP), at an expected annual capacity credit factor of 95.0% in the first year of operation. Calculation of an accredited unforced capacity (UCAP) for the facility is the product of the effective nameplate capacity and the applicable capacity credit factor. The CT Project is expected to provide approximately 380 MW of UCAP accredited capacity in the

GAO 2022-01 Guideline	Witness	CT Project
		Summer, Fall, Winter, and Spring MISO planning seasons in the first year of operation. The CT Project will be a variable resource able to be called upon by MISO and is a fully dispatchable resource with other reliability capabilities.
A description of how the generation is expected to perform at the relevant RTO's peak pursuant to its capacity construct.	Campbell	As noted above, the CT Project is expected to provide approximately 380 MW of UCAP accredited capacity in the Summer, Fall, Winter and Spring MISO planning seasons in the first year of operation.

NIPSCO

Erin A. Whitehead
Phone: 317-965-8334
Email: ewhitehead@nisource.com

RECEIVED
AUG 11 2023
INDIANA UTILITY REGULATORY COMMISSION

August 11, 2023

Via Hand Delivery
Dana Kosco
Secretary of the Commission
Indiana Utility Regulatory Commission
101 West Washington Street, Suite 1500 East
Indianapolis, Indiana 46204

RE: Notice of Intent to File Application for a Certificate of Public Convenience and Necessity

Dear Ms. Kosco:

In accordance with Indiana Utility Regulatory Commission General Administrative Order 2023-03, Northern Indiana Public Service Company LLC hereby provides notice of its intent to file an application for a Certificate of Public Convenience and Necessity pursuant to Ind. Code ch. 8-1-8.5 on or after September 12, 2023. Please let me know if you have any questions or concerns about this notice.

Sincerely,

Erin E. Whitehead
Vice President, Regulatory and Major Accounts

cc: *Via Email Transmission*
William Fine (wfine@oucc.in.gov)
Todd A. Richardson (trichardson@lewis-kappes.com)
Jennifer Washburn (jwashburn@citact.org)

Northern Indiana Public Service Company LLC ("NIPSCO")
General Administrative Order 2023-03
Index of Issues, Requests, and Supporting Witnesses

Below is NIPSCO's list of witnesses supporting its request for a certificate of public convenience and necessity ("CPCN") to construct a natural gas combustion turbine ("CT") peaker plant (the "CT Project") on available property at NIPSCO's R.M. Schahfer Generating Station ("Schahfer") site. This index is intended to highlight issues and is not an exhaustive list of the requests in this proceeding. A complete account of the requested relief can be found in Petitioner's case-in-chief.

Exhibit	Witness	Summary
1	Becker	Ms. Becker (1) provides an overview of NIPSCO's request in this proceeding, (2) explains how NIPSCO has supported the statutory requirements for the issuance of a CPCN, including financial incentives, under Ind. Code §§ 8-1-8.5-4, 8-1-8.5-5, and 8-1-8.8-11, (3) explains how NIPSCO has supported the requirements set out in Ind. Code § 8-1-2-0.6, and (4) explains how NIPSCO has addressed the guidelines for additional evidence to be provided pursuant to IURC GAO 2022-01. As it relates to the statutory requirements set out in Ind. Code § 8-1-8.5-4, Ms. Becker addresses the requirement to consider conservation and load management (Ind. Code § 8-1-8.5-4(2)).
2	Walter	Mr. Walter describes NIPSCO's current generation fleet and explains the ultimate portfolio NIPSCO currently expects to have in place to serve its customers after its coal-fired generating units are retired over the next five (5) years. He confirms that the CT Project is a clean energy project as that term is defined in Ind. Code § 8-1-8.8-2. He addresses consistency of the proposed construction of the CT Project with the five pillars outlined in Ind. Code § 8-1-2-0.6. He also describes NIPSCO's Integrated Resource Planning ("IRP") process and the need for a gas-fired generation resource identified in NIPSCO's 2021 IRP, and how the proposed CT Project complements its current fleet of resources and allows NIPSCO to address certain challenges associated with its ongoing generation

		transition. He also discusses proposed greenhouse gas emissions standards. He concludes by explaining why NIPSCO's request should be approved and a CPCN should be issued by the Commission.
3	Austin	Mr. Austin explains NIPSCO's gas distribution system as it relates to the CT Project, the quick-start, fast-ramping, and other important capabilities of the CT Project at the Schahfer site, and the new CT Project's contribution to NIPSCO's system reliability.
4	Warren	Mr. Warren sponsors the Engineering Study prepared by S&L which sets forth the Class 3 cost estimate for NIPSCO's proposed simple cycle gas turbine project that was used by NIPSCO to develop its best estimate of the costs of the proposed CT Project. He presents information regarding the engineering work completed by S&L in support of NIPSCO's request for approval of a new peaker power plant to be located at the Schahfer site. He explains the CT Project is currently expected to be comprised of one larger industrial frame combustion turbine with three smaller aeroderivative, or similarly sized industrial frame combustion turbines, for a total output of approximately 400 MWs.
5	Baacke	Mr. Baacke explains the CT Project, including key specifications and characteristics, the approach to configuration selection and the contracting strategy for the CT Project. He also provides the project schedule and the best estimate of costs of construction. He explains the CT Project is planned to be approximately 400 MW, consisting of one larger industrial frame unit with three smaller aeroderivative or similarly sized industrial frame units (dependent on the results of the CT original equipment manufacturer ("OEM") bid event). Finally, he discusses how the CT Project satisfies Ind. Code § 8-1-8.5-5(e).
6	Campbell	Mr. Campbell discusses: (1) how the CT Project will interconnect into the Midcontinent Independent System Operation Inc. ("MISO") market through the replacement generation interconnection process, (2) NIPSCO's need for capacity from a peaking unit, and (3) how NIPSCO

		will procure gas supply for the Project at the lowest reasonable cost. Finally, he discusses how the CT Project is consistent with the resource alternatives that must be evaluated under Ind. Code § 8-1-8.4-4.
7	Augustine	Mr. Augustine (i) provides an overview of NIPSCO's resource planning process and reviews the conclusions from NIPSCO's resource planning analyses over the last several years, particularly the 2021 IRP; (ii) reviews major market developments since NIPSCO's submission of the 2021 IRP; (iii) summarizes the portfolio analysis that CRA and NIPSCO performed in 2023 based on these major market developments; and (iv) describes how the CT Project is consistent with the Short-Term Action Plan identified in the 2021 IRP and supported by the additional analyses NIPSCO has performed since the submission of the 2021 IRP.
8	Blissmer	Mr. Blissmer supports NIPSCO's request for approval of financial incentives for the CT Project as a clean energy project under Ind. Code § 8-1-8.8-11. He explains NIPSCO's proposed ratemaking, which includes construction work in progress ("CWIP") ratemaking and explains how NIPSCO's proposed CWIP ratemaking satisfies the requirements of Ind. Code § 8-8.8-11. Mr. Blissmer also supports NIPSCO's request to implement a Generation Costs Tracker Mechanism ("GCT Mechanism") to record and recover costs associated with NIPSCO's proposed CT Project, including, (1) an overview of the proposed GCT Mechanism; (2) a description of the proposed ratemaking treatment; (3) an explanation of how the revenue requirement and the related factors will be calculated; (4) a description of the allocators NIPSCO proposes to use; (5) the proposed timeline for NIPSCO's initial and future GCT Mechanism tracker filings; and (6) an explanation of the proposed changes and additions to NIPSCO's electric service tariff. He also provides the estimated monthly bill impact in the initial GCT tracker filing as a result of the CT Project for an average residential customer.

Attachment 1-G

AFFIDAVIT OF ANDREW WITMEIER

I. INTRODUCTION AND QUALIFICATIONS

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND RELATIONSHIP TO THE MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC. ("MISO").

A. My name is Andrew Witmeier. I am the Director of Resource Utilization for the Midcontinent Independent System Operator, Inc. ("MISO"). My business address is: 720 City Center Drive, Carmel, IN 46032-7574.

Q. PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

A. I joined MISO in 2003 after graduating from Purdue University with a Bachelor's degree in Electrical Engineering. I spent the first 17 years of my career in various positions in MISO Operations. During that time I worked as a North American Reliability Corporation ("NERC") certified system operator in scheduling, engineering, and as a reliability coordinator. I also led several groups within MISO Operations as a manager in engineering, reliability coordination, and seams administration. In January 2020, I was appointed to my current position.

Q. PLEASE DESCRIBE YOUR JOB RESPONSIBILITIES WITH MISO AS THEY RELATE TO THIS FILING.

A. As the Director of Resource Utilization, I am responsible for the administration of MISO's Generator Interconnection Procedures ("GIP"), which are set forth in Attachment X of MISO's Open Access Transmission, Energy and Operating Reserve Markets Tariff

("Tariff"). I oversee MISO's generation interconnection queue, including the conduct of studies, and the negotiation and execution of Generator Interconnection Agreements.

II. PURPOSE OF THIS AFFIDAVIT

Q, ARE YOU SUBMITTING THIS AFFIDAVIT ON BEHALF OF MISO?

A. Yes

Q. WHAT IS THE PURPOSE OF YOUR AFFIDAVIT?

A. The purpose of my affidavit is to provide information requested by the Northern Indiana Public Service Company LLC ("NIPSCO") to enable their compliance with Indiana Utility Regulatory Commission General Administrative Order 2022-01 ("the GAO").

Q. PLEASE DESCRIBE THE NIPSO REQUEST FOR INFORMATION.

A. The request was an email, attached to this affidavit as Exhibit 1. The request provided a description of a potential project ("the Project") that has not yet been submitted into the MISO Generator Interconnection Queue ("the Queue"). The Project was described as a combination of one natural gas combustion turbine of approximately 220 MW, three flexible aeroderivative machines of between 50 and 60 MW each, a small switchyard, a maintenance building, and a two-to-three-mile line connecting to an existing transmission interconnection at the R.M. Schahfer Generating Station ("Schahfer"), with an estimated capital cost of six-hundred fifty five million dollars ($655 M) and projected to be in-service by the fourth quarter of 2026. The request asked that MISO enable NIPSCO's compliance with the GAO by providing descriptions of certain MISO processes and evaluations potentially involving the Project.

III. NIPSCO REQUEST FOR INFORMATION

Q. CAN MISO GIVE A GENERAL ASSESSMENT OF THE PROJECT?

A. At this time, MISO can only give a generalized assessment of the Project because it does not yet have an Interconnection Request[1] submitted to the MISO Generation Interconnection Queue.

Q. DOES MISO NEED TO DO A FULL ASSESSMENT OF THE PROJECT AT THIS POINT IN THE IURC PROCESS?

A. No. It is MISO's understanding that for the CPCN proceeding NIPSCO does not need to present the same level of details that are required for the MISO Interconnection process. The GAO requirement is new to MISO. We have historically reviewed the Interconnection Request and studied how it fits on the grid. This is a new request.

Q. WHAT WOULD MISO NEED TO PROVIDE A FULL ASSESSMENT OF THE PROJECT?

A. MISO's Tariff requires MISO to make determinations about the impacts of projects based on specific details in Interconnection Requests. Under the Tariff, an Interconnection Request contains relevant information such as the requested level of Interconnection Service, generating facility data, and short circuit and dynamic modeling information. A valid Interconnection Request for a new generating facility will enter the Definitive Planning Phase, a three phase study process,[2] while a Generating Facility Replacement request undergoes evaluation in a two study process, a Replacement Impact Study as set forth in Section 3.7.2.1 of Attachment X and a Reliability Assessment Study as set forth in

[1] Tariff Attachment X, Section 1 (Definitions).

[2] Tariff Attachment X, Section 7.2.

Section 3.7.2.2 of Attachment X.[3] As of the date of this affidavit, MISO has not received an Interconnection Request for the Project nor performed any of the applicable studies, therefore MISO cannot make specific statements regarding the impact of the Project.

Q. WHAT IS MISO'S GENERAL ASSESSMENT OF THE PROJECT?

A. From a generator interconnection process perspective, my general assessment is that using the Replacement Generating Facility Request[4] process ("Replacement Process") defined in the MISO Tariff to utilize existing Interconnection Service is a more efficient way of modernizing older resources than retiring and connecting new generation at different POIs on the transmission system. The request from NIPSCO stated that the Project was projected to have a Commercial Operation Date ("COD") in the fourth quarter of 2026. The ability for the Project to meet the COD depends on the date that an Interconnection Request is submitted for the Project and the proposed development schedule. The request for Generating Facility Replacement must be submitted for an Existing Generating Facility at least one year prior to the date that the Existing Generating Facility will cease operation unless the Existing Generating Facility is in suspension pursuant to Section 38.2.7 of the Tariff or in Forced Outage.[5]

Q. HOW DOES MISO EVALUATE GAS FIRED GENERATION IN ITS EVALUATION OF INTERCONNECTION REQUESTS?

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[3] Tariff Attachment X, Section 3.7.2.

[4] Tariff Attachment X, Section 3.7.

[5] Tariff Attachment X, Section 3.7.1.

A. MISO's Generator Interconnection Procedures are fuel and technology neutral, and MISO does not evaluate a project more or less preferably than another based on fuel type. This said, MISO acknowledges that the attributes of Generating Facilities that are proposed by Interconnection Customers can positively impact grid reliability and that both Interconnection Customers and regulators may consider how specific Generating Facilities may impact overall grid reliability. MISO simply notes that as the IURC considers the requested relief herein and MISO's GIP, that it also take grid reliability and the need for electric generation into account.

Q. COULD YOU PROVIDE COST ESTIMATES AND POTENTIAL COST ALLOCATION FOR INTERCONNECTION FACILITIES OR NETWORK UPGRADES, IF ANY, REQUIRED TO CONNECT THE PROJECT TO THE MISO TRANSMISSION SYSTEM?

A. I am not able to estimate costs for the Project at this time. However, if the Project successfully passes the tests needed to qualify for the Replacement Process, there should not be any Network Upgrades because Replacement requests are not allowed if they will have a material adverse impact on the Transmission System as compared to the Existing Generating Facility (in this case, Schahfer Units 17 and 18). This will be assessed through the Replacement Impact Study. If the results of that study do identify the need for a Network Upgrade and associated costs, then the Project will be processed as a new Interconnection Request. The costs of potential interconnection facilities will depend on the configuration of the Project as detailed in the interconnection request. While, generally speaking, projects using the same POI as an Existing Generating Facility that they are replacing tend to have lower interconnection facility costs when compared to new Projects

proceeding through the queue at a new Point of Interconnection, numerous factors can impact Interconnection Facility costs. MISO cannot provide an estimate before an Interconnection Request is received and the appropriate studies performed.

Q. ASSUMING NETWORK UPGRADES OR INTERCONNECTION FACILITIES ARE NEEDED, COULD YOU DESCRIBE THE SCOPE OF WORK AND CONSTRUCTION TIMELINES FOR SUCH FACILITIES?

A Network Upgrade would not be assumed to be necessary for a Replacement Facility, because under the Tariff, a Replacement Generating Facility that is determined to have an adverse impact on the transmission system that would require a Network Upgrade would be required to submit an Interconnection Request as a new Generating Facility.[6] If a Network Upgrade is necessary, the scope of work and construction timelines would need to be established through the Interconnection Request and Scoping Meeting with the Transmission Owner.[7] In general, the scope of work for replacement facilities are less than those required for a new facility because replacement facilities use the same POI. However, this may not always be the case and MISO cannot describe on the specific scope and timeline of a project prior to the Interconnection Request.

Q. COULD YOU GIVE A BRIEF DESCRIPTION OF THE MISO REPLACEMENT GENERATOR PROCESS AND CONFIRMATION THE PROJECT IS ELIGIBLE TO UTILIZE THIS PROCESS?

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[6] Tariff Attachment X, Section 3.7.2.1.

[7] Tariff Attachment X, Section 3.3.4.

A. The evaluation process for Generating Facility Replacements consists of two studies, a Replacement Impact Study and a Reliability Assessment Study.[8] The Replacement Impact Study[9] will include analyses to determine if the Replacement Generating Facility has a material adverse impact on the Transmission System when compared to the Existing Generating Facility. The Replacement Impact Study may include steady-state (thermal/voltage), reactive power, short circuit/fault duty, and stability analyses, as necessary, to ensure that required reliability conditions are studied. The Reliability Assessment Study[10] evaluates the performance of the Transmission System for the time period between the date that the Existing Generating Facility ceases commercial operations and the COD of the Replacement Generating Facility. The Reliability Assessment Study determines if thermal and/or voltage violations of applicable NERC Standards and Transmission Owner planning criteria are caused by removing the Existing Generating Facility from service prior to the COD of the Replacement Generating Facility. MISO cannot confirm the Project is eligible for the Generating Facility Replacement Process because eligibility under the Tariff cannot be determined until the Project has an Interconnection Request. Once the Project submits a Replacement Interconnection request, MISO will determine if the Project request complies with all requirements of the Tariff.

Q. WHAT IS MISO'S EVALUATION OF ANY POTENTIAL CONGESTION FROM THE PROPOSED PROJECT DUE TO LOCAL ENERGY DELIVERABILITY, IF ANY?

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[8] Tariff Attachment X, Section 3.7.2.

[9] Tariff Attachment X, Section 3.7.2.1.

[10] Tariff Attachment X, Section 3.7.2.2.

A. Information, such as historical data from Schahfer, may be available to help determine the possibility of any potential congestion from the Project; however MISO does not conduct any evaluations of historical congestion data as part of the Generator Interconnection Process.

IV. CONCLUSION

Q. DOES THIS CONCLUDE YOUR AFFIDAVIT?

A. Yes, it does.

Exhibit 1

From: Little \ Michael Bryan
Sent: Thursday, July 20, 2023 10:21 AM
To: jmoser@misoenergy.org
Subject: Privileged: NIPSCO's GAO Affidavit Request

Thank you for helping with this project. To comply with IURC GAO 2022-01, NIPSCO is seeking an affidavit from MISO that includes the following:

- MISO's general assessment of the Project, including the proposed installed facilities and point of transmission interconnection.
    - Project is a combination of one natural gas combustion turbine (approx. 220MW) and three flexible aeroderivative machines (50-60MW each), small switchyard, maintenance building, and two to three mile line to connect to existing transmission interconnection at R.M. Schahfer Generating Station.
    - Estimated capital cost is approx. $655 million (or approx. $1,629/kW)
    - Projected to be in-service by Q4 2026
- Cost estimates and potential cost allocation for interconnection facilities or network upgrades, if any, required to connect the proposed generating facilities to the MISO transmission system. [1]
    - Assuming network upgrades or interconnection facilities are needed, scope of work and construction timelines for such facilities.
- A brief description of the MISO replacement generator process and confirmation the Project is eligible to utilize this process.
- Description of the importance of dispatchable generation within MISO for capacity and reliability purposes, including within the new seasonal construct.
- MISO's evaluation of any potential congestion from the proposed Project due to local energy deliverability, if any.

M. Bryan Little
Assistant General Counsel
Legal Federal Regulatory
NiSource Corporate Services
301.704.5757

NiSource

Have a concern? Need to report confidentially and/or anonymously? Click below.

Affidavit of Andrew Witmeier

COUNTY OF HAMILTON)

)

STATE OF INDIANA)

Andrew Witmeier, being duly sworn, deposes and states that he prepared the Prepared Direct Testimony of Andrew Witmeier, and the statements contained therein are true and correct to the best of his knowledge and belief.

Andrew Witmeier

SUBSCRIBED AND SWORN BEFORE ME, this 11th day of September, 2023.

Kandi Hahn

My Commission Expires: March 23, 2030