
VERIFIED DIRECT TESTIMONY OF DAVID SAFFRAN

1 **Q1. Please state your name, title, and business address.**

2 A1. My name is David Saffran. My title is Generation Business Systems
3 Administrator in the Operations Management Reporting division of
4 Northern Indiana Public Service Company LLC ("NIPSCO" or the
5 "Company"). My business address is 2755 Raystone Drive, Valparaiso,
6 Indiana 46383.

7 **Q2. Please describe your educational and employment background.**

8 A2. I hold an Associate degree in Electronic Systems Technology from the
9 Community College of the Air Force, an Associate degree in Aerospace
10 Ground Equipment Technology from the Community College of the Air
11 Force and have attended classes for three years working towards a Bachelor
12 of Science degree in Computer Networking Information Technology at
13 Purdue Northwest. I have been employed by NiSource Inc. or NIPSCO
14 since May of 2004 in a variety of technical, supervisory, and administrative
15 positions.

16 **Q3. What are your responsibilities as Generation Business Systems**

1 **Administrator in the Operations Management Reporting division of**
2 **NIPSCO?**

3 A3. My current responsibilities include managing NIPSCO's various business
4 systems and programs, recording data concerning Generation's operational
5 and maintenance performance, and analyzing the results to identify
6 adverse trends and recommend corrective actions to improve performance.
7 In addition, I am responsible for submitting various NIPSCO Generation
8 reports and filings to local, state, and federal agencies such as the Indiana
9 Utility Regulatory Commission ("Commission"), Midcontinent
10 Independent System Operator, Inc., North American Electric Reliability
11 Council, Federal Energy Regulatory Commission ("FERC") and Indiana
12 Department of Natural Resources ("DNR").

13 **Q4. Are you familiar with the Company's Verified Petition, including the**
14 **exhibits attached thereto, initiating this proceeding, a copy of which has**
15 **been marked Attachment 1-A?**

16 A4. Yes.

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

1 A5. The purpose of my testimony is to provide information relevant to
2 Paragraph 6 of Exhibit A - Settlement Terms, attached to the Stipulation and
3 Agreement filed October 16, 2007 in Cause No. 38706-FAC71-S1 approved
4 by the Commission on January 30, 2008 ("FAC71-S1 Agreement") and
5 Paragraph 6(f.) of the Stipulation and Agreement filed September 23, 2009
6 in Cause No. 38706-FAC80-S1 approved by the Commission on November
7 4, 2009 ("FAC80-S1 Agreement") (collectively, the "Reporting
8 Agreements"). Paragraph 6 of the FAC71-S1 Agreement calls for NIPSCO
9 to submit testimony in its quarterly FAC proceedings regarding major
10 forced outages that occur within the pertinent FAC timeframe. Under this
11 provision, NIPSCO must describe the length and cause of each major forced
12 outage, generating unit involved, and proposed solutions to prevent such
13 outages from occurring in the future. In addition to the above provision
14 regarding the details of each major forced outage, Paragraph 6(f.) of the
15 FAC80-S1 Agreement calls for NIPSCO to file testimony describing the
16 details of and the steps taken to minimize such major forced outages in the
17 future. Paragraph 6(f.) of the FAC80-S1 Agreement defines a "major forced
18 outage" as a unit forced outage lasting longer than three (3) consecutive
19 days.

1 **Q6. Are you sponsoring any attachments to your testimony?**

2 A6. Yes. I am sponsoring Attachment 4-A and Confidential Attachment 4-B,
3 both of which were prepared by me or under my direction and supervision.
4 Attachment 4-A describes each major forced outage NIPSCO's generating
5 units experienced during the first quarter of 2024, which is the
6 reconciliation period in this FAC proceeding. Confidential Attachment 4-B
7 contains root-cause analysis reports regarding the outages listed in
8 Attachment 4-A that were complete at the time of this filing.

9 **Q7. Does Attachment 4-A comply with the Reporting Agreements?**

10 A7. Yes. In the Attachment, I explain each major forced outage and state the
11 actions NIPSCO has already taken or is able to take to prevent each outage
12 from occurring again.

13 **Q8. Does Confidential Attachment 4-B comply with the Commission's**
14 **October 29, 2019 Order in Cause No. 38706-FAC-124 ("FAC-124 Order")?**

15 A8. Yes. In its FAC-124 Order, the Commission directed NIPSCO to provide in
16 its future quarterly FAC filings, a root cause analysis for forced outages
17 when such an analysis has been completed at the time of the FAC filing.
18 That information is provided in Confidential Attachment 4-B.

1 **Q9. Does this conclude your prepared direct testimony?**

2 **A9. Yes.**

VERIFICATION

I, David Saffran, Generation Business Systems Administrator in the Operations Management Reporting division of 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.

A handwritten signature in dark ink, appearing to read 'David Saffran', is written over a horizontal line.

David Saffran

Dated: May 17, 2024

Major Forced Outage Report (Q1, 2024)

Michigan City 12	The unit was taken out of service due to a slag tank obstruction preventing the removal of bottom ash.
January 14	The north crusher was bound due to an errant piece of metal, and the fluid drive damaged beyond repair. The south crusher was operational but couldn't clear slag fast enough to prevent slag buildup.
188 hours	The obstruction was removed from the north crusher, and the fluid drive was replaced. The slag was cleared from the tank, and the unit placed in reserve.
R. M. Shahfer 16A	The unit was taken offline due to a noisy upper bearing on the main lube oil pump.
January 9	The lube oil pump was found to be bad and needed to be replaced.
73 hours	The lube oil pump was replaced, and the unit placed in reserve.
R. M. Shahfer 18	The unit was derated and ultimately taken offline due to the loss of four rows of precipitator fields.
January 25	A contractor found several transformer/rectifier wires down. This caused all the fields to short to ground.
147 hours	The contractor removed the downed wires to place the fields back in service. The downed wires will be replaced during the Spring planned outage. The unit was placed in reserve.
Sugar Creek CT 1A	The turbine rotor was damaged by a contractor while removing it during a scheduled major turbine outage. This event was previously reported in FAC-142
January 1	The forceful removal of the rotor resulted in a gall in a dovetail joint. The contractor deemed the damage as a No-Run condition.
570 hours	A new rotor was ordered, received, and installed. The unit was tested and returned to service January 24.

Confidential Attachment 4-B (Redacted)

NIPSCO

Cause No. 38706 FAC 143